7

# ENSV FY07 Inspection Transmittal Form

Todays Date: 11/26/200

Jws 4 1 1 2007

NSPECTION ACTI	VITY				£	11/00/
Media	Type of Inspection	Selec	ction Criteria		Compliance Offi	icer Inspection Dat
RCRA	CEI	Con	nplaint/Case Develor	oment	Aycock, J	11/07/2007
Inspector	Activity #					
Vhiting- D						
ACILITY INFORM	ATION			1		
acility Name			ID Number	NAICS	/SIC Code	
ri Rinse			MOR000505958		561900	
Address	City	/	County	State	ZIP	
402 2nd Street		Louis	St. Louis	MO		
acility Activity						
	Crushing steel containe	ers & selling for	scrap.			
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			4			
ULTIMEDIA FIND	INGS					
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		CYes No	ODINE! A Hallo	-		=RCRA, E/T=EPCRA/T
		SPCC □CWA	N MUST MPWS	U=l		PCC, U-I=UIC, Wet., P
		□RCRA □CFC				O CYes No



### ENSV FY07 Inspection Transmittal Form

Todays Date: 11/27/200

	Type of Inspection	Selection Criteria	Complian	nce Officer Inspection Date
RCRA	CEI	Complaint/Case Devel	opment Aycock	, J 11/07/2007
Inspector	Activity #			
Whiting- D				*
ACILITY INFORM	ATION			
Facility Name		ID Number	NAICS/SIC Code	
Tri Rinse		MOR00050595	8 561900	
Address	City	County	State ZIP	we.
1402 2nd Street	St. Lo	ouis St. Louis	MO	
Facility Activity	<b>7</b>		• • • • • • • • • • • • • • • • • • •	
g somaniors	Crushing steel containers	o a coming for corap.		
NSPECTION FIND Preliminary Findings (b	oriefly list regulatory deficiencies)		Potential SNC? OYes	ONO CIN/A
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### REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

### TRI RINSE INCORPORED

1402 South 2<sup>nd</sup> Street St. Louis, MO 63104-4424 Phone No.: (314) 558-4339 EPA I.D. NUMBER: MOR000505958

On

November 7-8, 2007

By

# U.S. ENVIRONMENTAL PROTECTION AGENCY Region VII Environmental Services Division

### INTRODUCTION

At the request of the Air and Waste Management Division (AWMD), a RCRA Compliance Evaluation Inspection (CEI) was conducted at Tri Rinse, Inc. in St. Louis, MO on 11/7-8/07. The CEI was conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended. The inspection was a Level B Multi-Media Inspection. A Multi-Media Screening Checklist is attached to this report (attachment 1). A Missouri Department of Natural Resources (MDNR) notification and waste stream information sheet is also attached (attachment 2). This narrative report and attachments present the results of the CEI.

### **PARTICIPANTS**

Tri Rinse, Inc. (Tri Rinse):
Clinton Shocklee, Manager, Environmental, Health & Safety
Tim Shocklee, Owner
Glen Potter, Maintenance Supervisor
Mike Kamrath, Sales Manager

U.S. Environmental Protection Agency (EPA): David N. Whiting, Environmental Engineer

Missouri Department of Natural Resources (MDNR): Darren Bernat, Environmental Specialist III

### INSPECTION PROCEDURE

Upon arrival at Tri Rinse, I contacted Mr. C. Shocklee and presented him my credentials. I explained to Mr. C. Shocklee the purpose of the CEI and the procedure I would follow, and discussed the confidentiality of business information with him. I explained to Mr. C. Shocklee my need to collect accurate information and left with him a copy of U.S. Federal Code Sections 1001 & 1002. The inspection consisted of a discussion of facility operations and waste management practices, and a visual examination of the facility. Mr. T. Shocklee accompanied me and Mr. C. Shocklee during the visual examination of the facility. Information collected during the CEI is recorded on data gathering sheets, which are referenced in the report. Photographs taken during the CEI are attached as inspection documentation (attachment 18). A photo log is included (attachment 17). At the conclusion of the inspection, I had an exit briefing with Mr. C. Shocklee. During the exit briefing, Mr. C. Shocklee acknowledged receipt of the following by his signature: a Notice of Violation, an Inspection Confidentiality Notice and a Receipt for Documents (attachments 3-5). No claim for confidential treatment of information was made during the inspection.

### **FACILITY DESCRIPTION**

Tri Rinse rinses steel and plastic containers and then sells the containers for salvage value. Steel containers are rinsed, crushed and sold for scrap value. Plastic containers are rinsed, sorted into high density and low density polyethylene, shredded and sold for scrap value. Mr. C. Shocklee said that the containers they receive previously held a variety of materials before processing at Tri Rinse. Mr. C. Shocklee said that only 5% to 10% of the containers previously held pesticides. Mr. C. Shocklee said that they do not accept any containers which are not empty, but do accept containers which are not previously rinsed. Mr. C. Shocklee said that if non-empty containers are received, arrangements are made to have the containers sent back to where the containers originated. Mr. C. Shocklee said that no non-empty containers have been received since they began operations at this location in June 2007. Rinsing is done on different lines for different size containers and different types of containers. Containers range in size from 2.5-gallons to 55-gallons. Rinse water is recycled during the rinse process. Containers which previously held pesticides are triple rinsed. Mr. C. Shocklee said that all rinse wastewater from processing pesticide containers is managed as hazardous waste. Tri Rinse also has mobile rinse equipment on trailers, which can be transported to a an off-site location to process containers.

Tri Rinse is located on 15 acres in an industrial area of St. Louis near the Mississippi river (attachment 6). Tri Rinse owns a 235,000 square foot building on this site (attachment 7). Tri Rinse operates out of 100,000 square feet in this building and rents out the remaining space to two unaffiliated companies. About 40 employees staff operations one shift per day, five days per week.

### FINDINGS AND OBSERVATIONS

Tri Rinse has notified as a large quantity generator of hazardous waste (LQG) and generates over 1,000 kilograms of hazardous waste each month. I inspected Tri Rinse as an LQG.

MDNR issued a Resource Recovery permit (RR0582) for Tri Rinse operations at the 1402 South 2<sup>nd</sup> Street location in August 2007 (attachment 8). Mr. C. Shocklee said that they started operations at this location in June 2007. The previous Tri Rinse Resource Recovery location at 5200 Manchester, RR0573, has been closed and sold. MDNR accepted closure certification of the previous Tri Rinse site in June 2007 (attachment 9).

Tri Rinse discharges rinse wastewater from containers which have not held pesticide to the sanitary sewer. Tri Rinse has an NPDES permit for storm water discharge (attachment 10).

### Wastes

Hazardous container rinsate is generated when un-rinsed containers which previously held pesticide are processed (attachment 16 page 5). The facility has determined that the rinsate is an acute hazardous waste and manages the rinsate from the processing as an acute hazardous waste. Waste codes are determined by the pesticide which the container previously held. The Tri Rinse resource recovery application identifies ten acute hazardous waste codes: P039, P044, P050, P066, P070, P071, P127, P189 and P194. In addition, the RR0582 permit includes D001 and D002 as acceptable waste codes for processing. The hazardous rinsate is shipped to Vequaes Technical Solutions LLC in Sauget, IL for incineration (attachment 11). To-date, Tri Rinse has shipped off-site about 9,700 gallons of hazardous rinsate identified as a corrosive hazardous waste, D002. There are also 660 gallons of hazardous rinsate in storage, which are identified with a D002 waste code. To-date, Tri Rinse has shipped off-site about 4,665 gallons of hazardous rinsate identified with P-listed waste codes. Tri Rinse has received and processed un-rinsed containers which previously held pesticide four times at their current location (attachment 12). The method in use to document container processing is a dated work order. The work order for the container shipment received on 10/31/07 did not include a date of processing (attachment 12 pages 1-2). This is a violation of RR0582 permit approval item number five (NOV #7).

Used solvent is generated from one small parts washer in the maintenance department (attachment 16 page 5). The parts washer is on an eighteen week service interval by Safety-Kleen. About seven gallons of used solvent are generated at each service. The used solvent is recycled in Safety-Kleen's continued use program, which is acceptable in Missouri. The invoice for the used solvent still includes hazardous waste codes as an ignitable hazardous waste, D001 and a toxicity characteristic hazardous waste, D018, D039 and D040. The used solvent has been collected once, on 9/11/07 (attachment 13). The invoice showed collection of seven gallons of used solvent and identified Tri Rinse's generator status incorrectly as a conditionally exempt small quantity generator of hazardous waste. I called Mr. C. Shocklee's attention to this error and suggested that accurate generator status information should be included on the Safety-Kleen invoices.

### **RCRA Status**

Tri Rinse is an LQG. During the last five months, Tri Rinse has generated about 10,360 gallons of corrosive hazardous waste and about 4,665 gallons of acute hazardous waste (attachment 11).

### **Large Quantity Generator Requirements**

### **Manifests and LDR Notices**

The use of manifests and land disposal restricted (LDR) waste notices is adequate (attachment 16 pages 6-7). I copied all manifests for shipments of hazardous waste rinsate shipped off-site and shipments of un-rinsed pesticide containers received (attachments 11 and 12).

### Reporting and Record Keeping

Tri Rinse has submitted a generator's hazardous waste summary report and a facility summary report to MDNR (attachment 14).

### **Personnel Training**

Hazardous waste management personnel training is inadequate in the following respects (attachment 16 page 8). There are no written job descriptions for positions related to hazardous waste management. This is a violation of 40 CFR 265.16(d)(2) (NOV #1). There is no written description of hazardous waste management training for employees in positions of hazardous waste management. This is a violation of 40 CFR 265.16(d)(3) (NOV #2).

### **Contingency Plan & Emergency Procedures**

The contingency plan is inadequate in the following respects (attachment 16 page 9). The contingency plan does not include the addresses of emergency coordinators. This is a violation of 40 CFR 265.52(d) (NOV #5). The contingency plan does not include the location and physical description and capabilities of emergency equipment. This is a violation of 40 CFR 265.52(e) (NOV #6). I obtained a copy of the "Emergency Management Plan" which Mr. C. Shocklee presented as the Tri Rinse contingency plan (attachment 15).

### **Use & Management of Containers**

There is a designated hazardous waste storage area inside the northwest corner of the building Tri Rinse occupies (attachment 7 page 1). The storage area is about 24 feet by 33 feet (attachment 16 pages 10-11). The storage area containment appeared adequate. There were 12 55-gallon containers of D002 waste in storage at this CEI. The storage containers were all dated, closed and marked "hazardous waste". The aisle space between and behind the containers was inadequate for inspection of the containers or access with spill response equipment (attachment 16 page 10, and attachment 18, photos 1-2). This is a violation of 40 CFR 265.34 (NOV #4). Mr. C. Shocklee said that the storage area is inspected at least weekly. The closest alarm to the container storage area is a fire alarm about 12 feet southeast of the storage area, near a door to the outside. Mr. C. Shocklee acknowledged that a fire alarm would not be used for a hazardous waste storage area emergency, unless it involved a fire (attachment 16 page 11). There is no other alarm or communication device at or near the hazardous waste container storage area. This is a violation of 40 CFR 265.34 (NOV #3).

There were no satellite accumulation containers because the rinsate is in process in the rinse water recycling tanks until container rinsing is completed. At that time, hazardous waste rinsate is pumped into storage containers.

### Air Emission Standards under Subparts AA, BB and CC

Tri Rinse has not generated hazardous waste subject to Subparts AA, BB and CC at this location, to-date (attachment 16 page 12).

### **SUMMARY**

At the exit interview I discussed the violations cited and the desirability of a facility representative to respond to the violations, in writing, within 14 days (attachment 16 page 13).

David N. Whiting

Environmental Engineer

Date: 11/23/07

### Attachments

- 1. Region VII Multi Media Inspection Checklist (2 pages)
- 2. MDNR Notification and Waste Stream Information sheet (1 page)
- 3. Notice of Violation (2 pages)
- 4. Inspection Confidentiality Notice form (1 page)
- 5. Receipt for Documents (1 page)
- 6. Aerial photo of facility (1 page)
- 7. Facility diagrams (2 pages)
- 8. Storm water discharge permit (4 pages)
- 9. RR0582 approval letter (4 pages)
- 10. RR0573 closure certification acceptance (1 page)
- 11. Manifests for hazardous wastes shipped off-site (5 pages)
- 12. Pesticide containers received and process work orders (8 pages)
- 13. Spent solvent invoice (1 page)
- 14. Summary reports to MDNR (7 pages)
- 15. Emergency management plan (13 pages)
- 16. Inspection data gathering sheets (13 pages)
- 17. Photo log (1 page)
- 18. Photographs, 2 photos (1 page)

REGION VII MULTIMEDIA SCREENING CH	HECKLIST
Facility Name: In Rince Inc.	Inspector Davis N Wating
Facility Ownership: Scarce	Primary Media: RCRA
Street: 1402 5. 2nd 5+.	/ Inspector Phone Ext.: (319) 887-2618
City: St. Lory's State: MO Zip: 6	
Phone: (3,4)647-8338 Facility Contact: Clint Shockles	SIC/NAICS Code 561900
Number of Employees: 40 Work Hours/Shifts 15pl 5clpw	Facility Subject to OSHA regulations Yes 🖾 No 🗆
Main facility activity, major process chemical(s) & description: Rinsing containers. Swap crushed st	rainers (2,5gat 55gal) +
	are a mobil drum ringe capability
(Check all that apply): painting/coating (water-based □, solvent-based □), printing □, re	/
water treatment [], refrigeration [], manufacturing [], parts washers/degreasing (water-bar	
non-halogenated-based E2), combustion (boiler, furnaces, oxidizers) I plating (chrome I S-W 105 solvent	] , other).
ENVIRONMENTAL JUSTICE ( Note: Forward to EJ if a concern is identified during you	ur inspection)
1. Is the facility located in an apparent low income area (e.g., with many abandoned and dil	
If yes, is facility less then 1000 feet from nearest routinely occupied property (house, sch	
EMERGENCY PLANNING & COMMUNITY RIGHT TO KNOW ACT (EPCRA) & TOXIC SU	JBSTANCE CONTROL ACT (TSCA)
1. Did facility file a Tier II report with fire department, Local & State Emergency Planning Co	
2. Did facility manufacture, import, or process (formulate, blend, package) >25,000 lbs of a	
Toxin (lead, mercury, or polycyclic aromatic compounds) at any time over the last 5 years	
3. Has the facility: If any box in question 3 is marked - Forward to EPCRA	a sa ay tyrir managaran and a sa s
a. Stored ≥500 lbs of ammonia □, ≥100 lbs of chlorine □, or ≥10,000 lbs of an indust	trial chemical   . at any time over the last 2 years?
b. Stored ≥10,000 lbs of pressurized flammable material (propane, methane, butane, p	
c. Used ≥10,000 lbs of ammonia □, chlorine □, halogenated solvents □, solvent-ba	
over the last calendar year? □	
<ul> <li>d. Generated ≥ one half pound of metal dusts, fumes, or metal turnings, over the last of</li> </ul>	•
4. Does the facility have any oil filled electrical equipment. No ☑ (stop) Yes ☐ Forward equipment to determine PCB content; No ☐ Yes ☐ number containing PCBs greater equipment tested Is equipment leaking (including wet or weeping equipment.)	than 50 ppm and percent of all
CI CAN WATER ACT (CINA) Medianal Balludian Disabana Elimination Custom (MDDE	Ch Industrial Production of Charm Mater 9 Matter de
CLEAN WATER ACT (CWA) - National Pollution Discharge Elimination System (NPDE	
1. Does the facility discharge any wastewater to storm sewers, surface water, or the land?	
If yes, are all wastewater discharges permitted? Yes 🗗 No 🗆 Forward to CWA	Clinton Shocklee
If yes, are <u>all</u> wastewater discharges permitted? Yes No Described Forward to CWA.  2. Does the facility have <u>process wastewaters</u> that are discharged to a city POTW (Publicly If yes, are the discharges permitted by: State? D, City D, If yes, Stop here.	NO LI Forward to CWA
If yes, does the city have a state or EPA approved pretreatment program? Yes	NO OF DON'T KNOW LI POWARD TO CWA No discharge Com
3. During rainfall events, can storm water carry pollutants from manufacturing, processing,	1
construction sites >1 acre, to storm sewers or surface water? No □ (stop) Yes □	
If yes, does the facility have an NPDES permit for these storm water discharges? Ye	
4. Did you see any wastewater discharges not identified by the facility? No □ (stop)	the confirmation of the co
none obser	
5. Does the facility have any wetland areas (e.g. streams, ponds, or temporarily wet areas)	
if yes, have any wetland areas been dredged, filled, channelized, dammed, or had gran	
No □ (stop) Yes □ - Identify location and timeframe	(Get Photo) FWD to Wetlands
	at a second of the second of t
Version 08.23.05a GRAY SHADED AREAS INDICATE ITEMS YOU NEED	TO LOOK FOR DURING VISUAL INSPECTION
	1 - 1 7
The state of the s	ATTACHMENT Page of Z

SAFE DRINKING WATER ACT (SDWA) - Underground Injection Control (UIC) & Public Water System (PWS)
1. Does facility discharge any liquids to the subsurface (septic systems, disposal wells, cesspools, etc.)? No 🖾 (stop) Yes 🖂 Forward to UIC
If yes, do these liquid wastes consist of sanitary wastewater only? Yes No 120 MM
2. Does facility provide drinking water to 25 people or more from its own source (private well, pond, etc.)? No [2] (stop) Yes [3] Forward to PWS
If yes, does the facility test or monitor its drinking water in order to comply with state regulations? Yes  No
CLEAN AIR ACT (CAA) and CFCs
The state of the s
1. Do you see any dense, non-steam, smoke or dust emissions leaving the facility property? No IZ Yes  Forward to CAA Source (Get Photo)
2. Does the facility have any new air pollution emitting equipment that was constructed or installed in the past 5 years? No 🗆 (stop) Yes 🗆
If yes, is equipment permitted? Yes I No I Forward to CAA Describe: product pour line area ventilation
3. Does the facility have any cooling units that contain >50 lbs of refrigerant? No 🖾 (stop) Yes 🖂 Forward to CFC
If yes, are these units: Self-serviced?   Contract Serviced?   Service Company:
4. Does the facility have a refrigeration process that contains more than 10,000 lbs of ammonia? No 🗵 (stop) Yes 🗆 Forward to EPCRA/RMP
5. Does the facility service motor vehicle air conditioning systems? No 🖸 (stop) Yes 🔘 Forward to CFC
RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) and UNDERGROUND STORAGE TANKS (UST)
1. Does the facility generate more than 30-gallons (220 lbs./100kg) of hazardous waste per month or at any one time? No 🗆 (stop) Yes 🗆
If yes, does facility have an EPA Hazardous Waste Identification Number? Yes (stop) No Forward to RCRA
2. Is hazardous waste treated □ , stored >90-days □, burned □ , land filled □ , put in surface impoundments □ or waste piles □ ?  No □ (stop) Yes □ If yes, is the facility permitted for above described activity? Yes □ No □ Forward to RCRA
3. Did you see or does the facility have any large quantities of materials that the facility claims to be non-hazardous waste material (>10 drums,
roll-offs, waste piles, etc exclude clean office trash, cardboard, & packaging type wastes)? No ☐ (stop) Yes ☐
Material Claimed To Be Non-Hazardous How does the facility know these wastes are non-hazardous?
10,000 cal /mo was h was Testing, industry or manuf. info, MSDS, etc. : None available : Forward to RCRA
Testing, industry or manuf. info, MSDS, etc., □; None available □ Forward to RCRA
Testing, industry or manuf. info, MSDS, etc. □; None available □ Forward to RCRA
Testing, industry or manuf. info MSDS, etc. ☐; None available ☐ Forward to RCRA
4. Did you see any leaking hazardous waste containers, drums, or tanks? No El Yes El Forward to RCRA
Describe: (Get Photo)
5. Did you see any signs of spills or releases (e.g., dead or stressed vegetation, stains, discoloration)? No Describe: (Get Photo)
6. Did you see any chemical or waste handling practices that concern you (access to children/public)? No El Yes El Forward to RCRA &
EPCRA Describe: Disce Space & Minimal (Get Photo)
7. Does the facility have any past or present underground petroleum product or hazardous material tanks? No 2 Yes D Forward to UST
8. Does the facility have any underground fuel tanks for emergency generators? No 🖾 Yes 🗆 Forward to UST
SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN (SPCC)
1. Does the facility have any aboveground oil tanks (petroleum, synthetic, animal, fish, vegetable), with an aggregate volume >1,320 gallons?
No ☑ (stop) Yes ☐ - Does the facility have a certified SPCC Plan? Yes ☐ No ☐ Forward to SPCC
If yes, are there secondary containment systems for the tanks? Yes D No D Forward to SPCC
If yes, are any tanks leaking where oil could reach waters of the State or U.S.? No  Yes  (Get Photo) Forward to SPCC
ENVIRONMENTAL MANAGEMENT SYSTEMS (EMS)
1. Does your facility have an EMS? No Cl Yes 12
2. Is the facility's EMS ISO 14001 certified? No ☑ Yes ☐
* PLEASE TAKE PHOTOS TO DOCUMENT POTENTIAL PROBLEMS
Version 08.23.05a GRAY SHADED AREAS INDICATE ITEMS YOU NEED TO LOOK FOR DURING VISUAL INSPECTION
THE HOATTA

ATTACHMENT L Page 2 of 2

### Notification And Waste Stream Information

**Epa ID** MOR000505958 **Missouri ID** 042402 Facility Status Large Quantity 07/06/2007 Notification Update Was Received: 07/06/2007 Record Add/Changed: 07/09/2007 Date EPA Id Issued Company Name TRI RINSE INC 1402 S 2ND ST Facility Address ST LOUIS, MO 63104-4424 County ST LOUIS CITY Latitude Decimal Format 0.000000 Longitude Decimal Format 0.000000 Method Of Collection Collection Site Mailing Address 1402 S 2ND ST ST LOUIS, MO 63104-4424 Contact Person/Position CLINTON SHOCKLEE **Phone Number** (314) 558-4339 Facility Owner TIMOTHY P SCHOCKLEE Facility's Owner Address 1402 S 2ND ST ST LOUIS, MO 63104 Owner's Phone Number (314) 647-8338 Owner Type Private Property Owner's Name TP INVESTMENTS Propety Owner's Address 14-2 S 2ND ST ST LOUIS. MO 63104 Property Owner's Phone Number (314) 647-8338 Property Owner Type Private SIC Code 561900 Generator/Facility Information is Confidential TSD Facility TSD Identification Number: ☐ Large Quantity Handler Of Universal Waste RCRA Identification Number: Registered EPA Hazadous Waste Numbers P039 P044 P050 P070 P071 P094 P127 P189

ATTACHMENT Z-Page L of L

## Notice of Violation Pursuant to Requirements of the Resource Conservation and Recovery Act (RCRA)

TO: Facility Name: Tri Rin	The The
Address: 1402 3	5. 2 kg 54.
St. Loui	5, MO 63104-4424
EPA ID Number: MOROOO	505958 Date: 11/8/07
This notice does not constitute a comp	tention to the following areas of noncompliance with state and federal regulations.  Diance order (Administrative Civil Complaint) pursuant to Section 3008 of RCRA all violations resulting from the the inspection.
Citation	Description of Violation
	Mownthen job descriptions for positions  related to hazordous waste management.  Mownthen description of hazordous waste  management training.  Inadequate access to an alarm or emergency  communication device at the hazordous waste  Container storage area.  Inadequate aisle space around hazordous waste  containers in the storage area.  Contingency plan does not include the addresse of the emergency coordinators.  Contingency plan does not include the location and physical address tion and capabilities of amagency equipment response within 14 calendar days of receipt of this notice. Your response should actions taken and/or a schedule for completing the necessary corrective actions.
	S. Environmental Protection Agency, Region VII  April 10 Whiting  922 Walnut St.  Towa City, IA 52240  TTN.
	Notice or wish to discuss your response, you may call me at  (Compliance Officer) at
This Notice prepared by	M. Whiting Date: 11/8/07
The undersigned person acknowledge	es that he/she has received a copy of this Notice and has read same.
	nted Name: Chalan Shadde Date: 11-8-67 nature: FHSD

Page 1 of 2 ATTACHMENT 3 Page 1 of 2

## Notice of Violation Pursuant to Requirements of the Resource Conservation and Recovery Act (RCRA)

TO: Facility Name: Iri	linse In	C.	
Address: 140	2 5. 264:	63104-4424	
EPA ID Number: MOK	00050595	8 Date: /	1/8/7
			101
	compliance order	(Administrative Civil Complaint)	e with state and federal regulations. pursuant to Section 3008 of RCRA
Citation		Description	of Violation
Approval item No	tion D	ne of four processi	Date of processing.
T			
You are requested to submit a wrinclude a description of all correct The response should be submitted	tive actions taken d to:		
	- Davie	1. Whiting	
	- Swa	City IA 52240	
	ATTN		
If you have any questions about to (219) 887-2618		to discuss your response, you man	
This Notice prepared by	nd n. n	thiting	Date: 11/8/07
The undersigned person acknowle	edges that he/she	has received a copy of this Notice	e and has read same.
	Printed Name: Signature:	Chilor Shocklee	Date: 11-5-07
	Title:	+ 11 2	

Page Zof Z ATTACHMENT 3 Page Z of Z

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY CONFIDENTIALITY NOTICE

Facility Name	And Continues
Iri Risse Inc.	
Facility Address	
1402 S. 2rd St., St. Louis, MO 63104-4424	
Inspector (print)	
David M. Whiting	
U.S. EPA, Region VII, 901 N. 5th St., Kansas City, KS 66101  Date 11/8/07	
The United States Environmental Protection Agency (EPA) is obligated, under the Freedom of Information Act,	
to release information collected during inspections to persons who submit requests for that information. The Freedom of Information Act does, however, have provisions that allow EPA to withhold certain confidential business	
information from public disclosure. To claim protection for information gathered during this inspection you must	
request that the information be held CONFIDENTIAL and substantiate your claim in writing by demonstrating that the information meets the requirements in 40 CFR 2, Subpart B. The following criteria in Subpart B must be met:	
1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue	
to take such measures.	
2. No statute specifically requires disclosure of the information.	
3. Disclosure of the information would cause substantial harm to your company's competitive position.	All Dates day
Information that you claim confidential will be held as such pending a determination of applicability by EPA.	<b>北朝</b> 李明 弘
I have received this Notice and <u>DO NOT</u> want to make a claim of confidentiality at this time.	
Facility Representative Provided Notice (print)  Signature/Date	
Chalor Shocklee Mai Succe 11/8/07	
I have received this Notice and DO want to make a claim of confidentiality.	
Facility Representative Provided Notice (print)  Signature/Date	
Information for which confidential treatment is requested;	

(Rev: 11/15/99)

ATTACHMENT Page 1 of 1

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY RECEIPT FOR DOCUMENTS AND SAMPLES

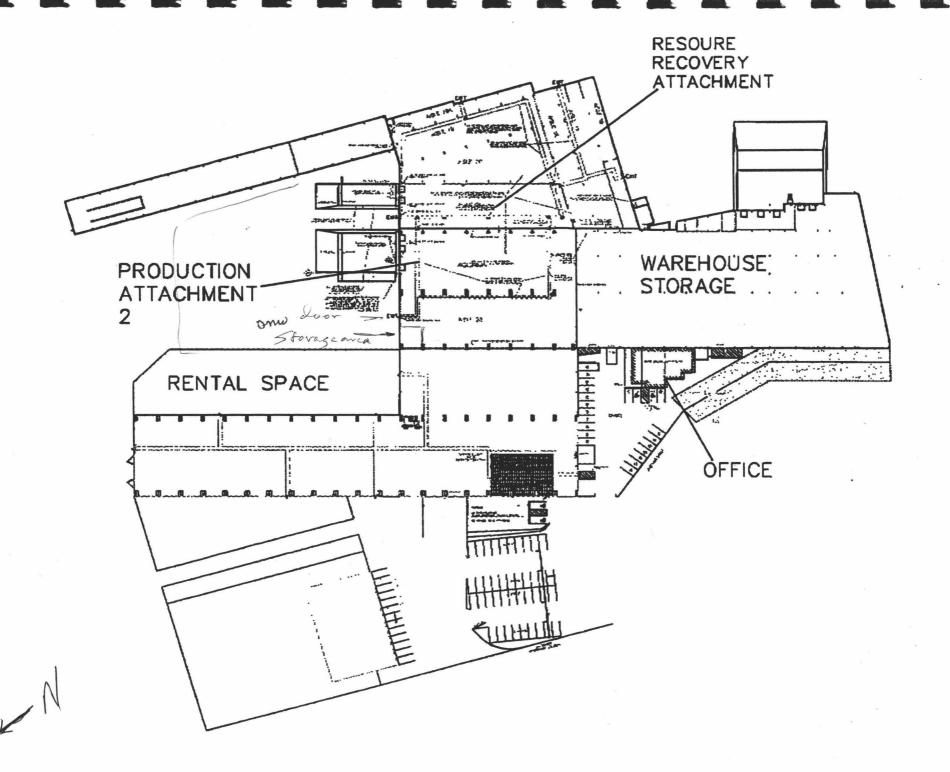
Facility Name Thise Inc.
Facility Address 1402 5. 2hd St., St. Louis, MO 63104 4424
Documents Collected? YES/ (list below) NO
Samples Collected? YES (list below) NO Split Samples: YES NO
Documents/Samples were: 1)Received no charge 2)Borrowed 3)Purchased
Amount Paid: \$ Method: Cash Voucher To Be Billed
The documents and samples described below were collected in connection with the administration and enforcement of the applicable statute under which the information is obtained.
Receipt for the document(s) and/or sample(s) described below is hereby acknowledged:
1) Energency management plan (13 pages)
Manifests & one LDR notice for wastes shipped off-site (4 egs)
I Two menifests for waster shipper off-site from 3200 Monchester (2000)
1) Manifests + processing work orders for hazordous waste received (Epages)
Generator's hozardous waste summary report, excerpt (3 pages)
) tacility summary report, excerpt (4 pages)
1) Closure contituation for 5200 Manufester - 15 10573 (1992)
NPDES germit (4) pages)
1) Satety Meen invoice (page)
Facility Representative (print)  Signature/Date
Inspector (print) Signature/Date
David M. Whiting Dar Matherine 11/8/07
U.S. EPA, Region VII, 901 N. 5th Street, Kansas City, KS 66101

ATTACHMENT 5 Page 1 of 1

Change to 11x17 Print Size Back To TerraServer Show Grid Lines Change to Landscape **■USGS St. Louis, Missouri, United States** 22 Mar 2002 \_50 m 50yd

Image courtesy of the U.S. Geological Survey
© 2004 Microsoft Corporation. **Terms of Use Privacy Statement** 

ATTACHMENT Le Page L of L



### RECEIVED

JUL 3 1 2007

HAZARDOUS WASTE PROGRAM MO DEPT. OF NATURAL RESOURCES

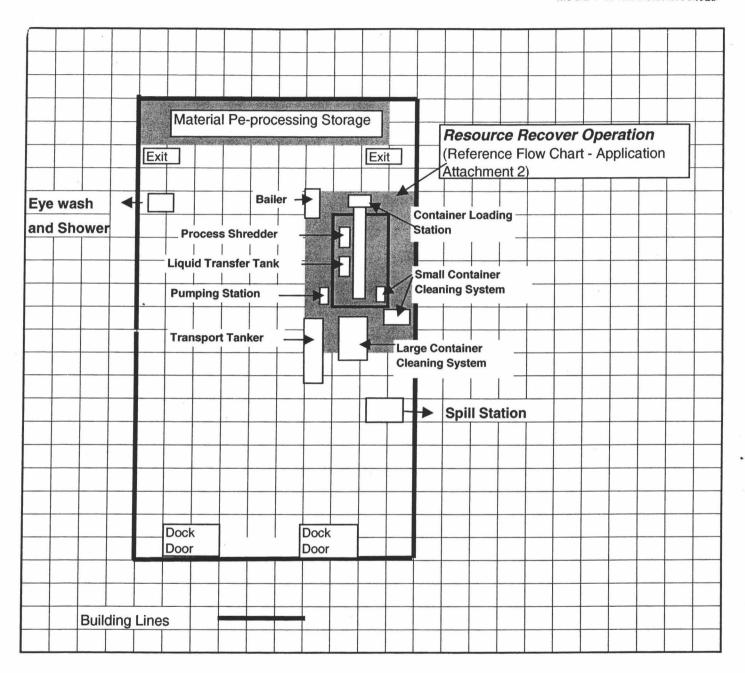


FIGURE 2
RESOURCE RECOVERY Y SYSTEM
TRI-RINSE
7-14-2007

ATTACHMENT 7 Page 2 of 2

### STATE OF MISSOURI

### DEPARTMENT OF NATURAL RESOURCES

MISSOURI CLEAN WATER COMMISSION



### MISSOURI STATE OPERATING PERMIT

GENERAL PERMIT

In compliance with the Missouri Clean Water Law, (Chapter 644 R.S. Mo. as amended, hereinafter, the Law), and the Federal Water Pollution Control Act (Public Law 92-500, 92<sup>nd</sup> Congress) as amended,

Per	mit	No.:	

MO-R80H000

is authorized to discharge from the facility described herein, in accordance with the effluent limitations and monitoring requirements as set forth herein:

#### FACILITY DESCRIPTION

All Outfalls

Solid waste transfer stations, SIC 4953; and solid waste recovery facilities, SIC 5093. Stormwater discharge only.

This permit authorizes only wastewater, including storm waters, discharges under the Missouri Clean Water Law and the National Pollutant Discharge Elimination System; it does not apply to other regulated areas. This permit may be appealed in ccordance with Section 644.051.6 of the Law.

February 6, 2004 Effective Date

Stephen M. Mahi bod, Director, Department of Natural Resources Executive Secretary, Clean Water Commission

February 5, 2009

**Expiration Date** 

Jim Hull, Director, Water Pollution Control Program

ATTACHMENT 8 Page 1 of 4

#### REQUIREMENTS

Note: These requirements do not supersede nor remove liability for compliance with county and other local ordinances.

- General Criteria. The following water quality criteria shall be applicable to all waters of the state at all times including mixing zones. No water contaminant, by itself or in combination with other substances, shall prevent the waters of the state from meeting the following conditions:
  - (a) Waters shall be free from substances in sufficient amounts to cause the formation of putrescent, unsightly or harmful bottom deposits or prevent full maintenance of beneficial uses.
  - (b) Waters shall be free from oil, scum and floating debris in sufficient amounts to be unsightly or prevent full maintenance of beneficial uses.
  - (c) Waters shall be free from substances in sufficient amounts to cause unsightly color or turbidity, offensive odor or prevent full maintenance of beneficial
  - (d) Waters shall be free from substances or conditions in sufficient amounts to result in toxicity to human, animal or aquatic life.
  - (e) There shall be no significant human health hazard from incidental contact with the water.

  - (f) There shall be no acute toxicity to livestock or wildlife watering.(g) Waters shall be free from physical, chemical or hydrologic changes that would impair the natural biological community.
  - (h) Waters shall be free from used tires, car bodies, appliances, demolition debris, used vehicles or equipment and solid waste as defined in Missouri's Solid Waste Law, section 260.200, RSMo, except as the use of such materials is specifically permitted pursuant to section 260.200-260.247.
- All paint, solvents, petroleum products, and petroleum waste products (see item #4 on fuels), and storage containers (such as drums, cans, or cartons) shall be stored so that these materials are not exposed to storm water. Spill prevention, control, and/or management shall be provided sufficient to prevent any spills of these pollutants from entering waters of the state. Any containment system used to implement this requirement shall be constructed of materials compatible with the substances contained and shall also prevent the contamination of groundwater.
- Good housekeeping practices shall be maintained on the site to keep solid waste from entering waters of the state.
- All fueling facilities present on the site shall adhere to applicable federal and state regulations concerning underground storage, above ground storage, and dispensers, including spill prevention, control and counter measures.
- Substances regulated by federal law under the Resource Conservation and Recovery Act (RCRA) or the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) that are transported, stored, or used for maintenance, cleaning or repair shall be managed according to the provisions of RCRA or CERCLA.
- An individual shall be designated by the permittee as responsible for environmental matters. Staff of the permitted facility shall inspect, on workdays, any structures that function to prevent pollution of storm water or to remove pollutants from storm water and of the facility in general to ensure that any Best Management Practices are continually implemented and effective.
- All involved personnel shall be trained in material handling and storage, and housekeeping of maintenance areas. Upon request, proof of training shall be submitted to the Department.

#### SAMPLING REQUIREMENTS

The permittee shall sample storm water runoff during a precipitation event or snowmelt, which causes a discharge. If no discharge occurs during the months specified for sampling, report as a no-discharge. Results of sampling shall be maintained by the permittee for five years and shall be supplied to the Department of Natural Resources as outlined in Part A on Page 6. If the results show a violation of the effluent limitations, the permittee shall notify the Department of Natural Resources as outlined within five days of the permittee's notification of analytical results. The notification shall indicate the date(s) samples were collected, the analytical results, permit number and shall describe what steps have been taken to eliminate the violation in the future. A repeat sample shall be collected of storm water runoff resulting from the next rainfall greater than 0.3 inches after a violation has been reported. This sample shall be analyzed and this data shall also be submitted to the Department of Natural Resources.

#### PERMIT TRANSFER

This permit may be transferred to a new owner by submitting an "Application for Transfer Of Operating Permit" completed and signed by the seller and buyer of the facility, along with the appropriate modification fee.

### TERMINATION OF PERMIT

If activities covered by this permit have ceased and no significant material remains on site and this permit no longer applies, the permittee shall request termination of this permit. The permittee shall submit Form H, Termination of a General Permit.

#### DUTY OF COMPLIANCE

The Permittee shall comply with all conditions of this general permit. Any noncompliance with this general permit constitutes a violation of Chapter 644, Missouri Clean Water Law, and 10 CSR 20-6.200. Noncompliance may result in enforcement action, termination of this authorization, or denial of the permittee's request for renewal.

Date of Fact Sheet: November 26, 2003

Date of Public Notice: December 19, 2003

FACT SHEET

General Permit

Solid Waste Transfer Stations

NPDES No. MO-R80H000

The Federal Water Pollution Control Act ("Clean Water Act" Section 402 Public Law 92-500 as amended) established the National Pollutant Discharge Elimination System (NPDES) permit program. This program regulates the discharge of pollutants from point sources into the waters of the United States, and the release of stormwater from certain point sources. All such discharges are unlawful without a permit (Section 301 of the "Clean Water Act"). After a permit is obtained, a discharge not in compliance with all permit terms and conditions is unlawful. Permits in Missouri are issued by the Director of the Department of Natural Resources under an approved program, operating in accordance with federal and state laws (Federal "Clean Water Act" and "Missouri Clean Water Law" Section 644 as amended).

State Programs have the authority to issue general permits to sources of discharge if the Director feels that a general permit appropriately controls the discharge. Storm water from solid waste transfer stations, SIC code 4953 and solid waste recovery facilities, SIC Code 5093, is a point source, and consequently is subject to permit requirements. Because the discharges authorized by this permit covers facilities which: involve the same or substantially similar types of operations; discharge the same types of waste waters; require the same operating conditions; or require the same monitoring; the Department has determined that under the requirements for General Permits, the discharges authorized by this permit are eligible for a general permit.

The proposed general permit is for discharge of water from solid waste transfer stations and solid waste recovery stations located within the state of Missouri. This proposed permit would allow the discharge of storm water that meets the limitations specified in this permit. Please note that this permit does not cover landfills. Facilities that are only operating a truck fleet need to apply for General Permit MO-R80C, Motor Freight Transportation. The treatment system, if needed, will vary from site to site dependent upon waste characteristics, concentration, and receiving stream standards.

The 10 CSR 20-7.031 Missouri Water Quality Standards, Missouri Department of Natural Resources (the Department) "defines the Clean Water Commission water quality objectives in terms of water uses to be maintained and the criteria to protect those uses." The receiving stream's beneficial water uses to be maintained have been assumed to be: livestock watering, wildlife watering, and protection of aquatic life.

To protect these beneficial uses and the water quality of the receiving stream, effluent limitations are being established under federal and state laws and Best Management Practices (BMPs) are required.

This permit will expire five (5) years from the date of issuance.



Matt Blunt, Governor • Doyle Childers, Director

### IT OF NATURAL RESOURCES

www.dnr.mo.gov

August 17, 2007

CERTIFIED MAIL – 7004 1160 0000 8176 7185 RETURN RECEIPT REQUESTED

Mr. Clint Shocklee Tri-Rinse, Incorporated 1402 South Second Street St. Louis, MO 63104

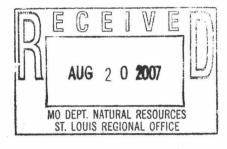
RE:

Tri-Rinse, Incorporated

Approved Resource Recovery Certification RR0582

Classification - R2

Dear Mr. Shocklee:



This letter is to inform you that the Missouri Department of Natural Resources' Hazardous Waste Program (HWP) has completed a review of the Tri-Rinse, Inc.'s application, dated March 13, 2007, and supporting documents dated July 18, 2007, and July 31, 2007, for resource recovery certification. This letter, as well as the approved resource recovery certification and applicable regulations, should be maintained together at the facility and reviewed often to determine compliance with the plans, processes, terms, and conditions of this certification. If discrepancies are found during this review, Tri-Rinse, Inc., should make immediate corrections and contact the necessary authority to ensure compliance.

The department hereby certifies for resource recovery, Tri-Rinse, Inc., St. Louis, Missouri, to recover off-specification materials from off-site sources, in accordance with conditions 1 through 12 below:

- 1. The owner/operator shall comply with 10 CSR 25-9.020, and all plans and processes described in the approved resource recovery application. The resource recovery regulations may be found on the internet at http://www.sos.state.mo.us/adrules/csr/current/10csr/10c25-9.pdf.
- 2. The owner/operator shall only receive and process hazardous waste that is characterized by hazardous waste codes D001 and D002, and various empty containers characterized as P-listed waste. This does not preclude the receipt/processing of "off-specification" materials that are not hazardous waste. Should the owner/operator propose to receive any



other hazardous waste stream for processing in the resource recovery operation, Tri-Rinse must submit a request to the department for a modification to the resource recovery certification. This change would be considered a major change of the facility operation in accordance with 10 CSR 25-9.020(3)(E) 1., and would require submission of a written request to the department, at least 60 days prior to the proposed date of the change.

- 3. If the owner/operator receives a material as a hazardous waste for processing under the resource recovery certification, and the end user of the reclaimed material is not one of the generator's facilities or affiliates, Tri-Rinse must obtain written approval from the department for each proposed material destination and end use. This approval request shall contain the following:
  - a. the name and address of the generator of the hazardous waste,
  - b. the name of the hazardous waste and corresponding waste codes,
  - c. a detailed description of the proposed end use of the material once it is processed, and
  - d. the name and address of the proposed end user.

Tri-Rinse must request approval for this activity at least 60 days prior to the proposed date of receipt of the hazardous waste.

- 4. If the owner/operator receives a material as a hazardous waste for processing under the resource recovery certification, the following activities are excluded as possible end uses of that material:
  - a. the material could not be sent to a hazardous waste disposal facility to be treated in any way or used as a fuel,
  - b. the material could not be sent to a landfill for use constituting disposal, and
  - c. the end use could not be such that the material would be applied to the land unless Tri-Rinse receives written approval from the department for such application.

Tri-Rinse must request approval for this activity at least 60 days prior to the proposed date of receipt of the hazardous waste.

5. Materials received by the owner/operator as "off-specification" or otherwise unusable by the generator in the state they exist are considered solid (and potentially hazardous) wastes. Please note that pursuant to 10 CSR 25-6.263(2)(A) 10.I., Tri-Rinse will not be acting as a transfer facility, and that the resource recovery certificate does not grant any ability to store hazardous wastes. Any hazardous waste received by Tri-Rinse must be processed within 24 hours of receipt. If Tri-Rinse receives hazardous waste without a manifest, that shipment of material must be either returned to the generator, or if Tri-Rinse can properly process the waste, the owner/operator may accept the load and submit an unmanifested

Mr. Clint Shocklee Page Three

waste report to the department and take appropriate action such that they do not receive unmanifested hazardous waste from that source in the future. This condition does not apply to "off-specification" materials that are not hazardous wastes. The "off-specification" wastes that are not hazardous wastes shall be stored/managed in compliance with applicable federal, state, and local regulations.

- 6. The owner/operator must comply with all applicable requirements of Land Disposal Restriction Regulations in accordance with 40 CFR Part 268.
- 7. The owner/operator shall document, within 30 days of receipt of this letter, contact with the City of St. Louis, Division of Air Pollution Control, Permitting Section, by telephone at (314) 613-7300 to verify compliance with all federal, state, and local regulations concerning air emissions.
- 8. The owner/operator shall comply with the regulations regarding modification of the resource recovery facility given by 10 CSR 25-9.020(3)(E)(1) and the general operating requirements for all resource recovery facilities given by 10 CSR 25-9.020(3)(E).
- 9. 10 CSR 25-9.020(3)(E)(1) requires the owner/operator to submit a written request to the HWP for approval at least 60 days prior to closure (a major modification of the certification per 10 CSR 25-9.020(3)(E)) of the resource recovery process. A plan addressing the disposition of the process equipment and any associated hazardous wastes (including hazardous waste residues from decontamination of the unit) and detailed decontamination and sampling procedures shall accompany the written notification of closure per 10 CSR 25-9.020(3)(E)(1)(A) and 10 CSR 25-9.020(3)(E)(1)(B).
- 10. The owner/operator shall maintain a containment system for the process equipment that meets the standards found at 40 CFR 265.193.
- 11. The owner/operator shall submit quarterly reports to the program. The forms for such reports is found on the internet at <a href="http://www.dnr.mo.gov/forms/780-1097.pdf">http://www.dnr.mo.gov/forms/780-0408.pdf</a>.

  http://www.dnr.mo.gov/forms/780-0408.pdf.
- 12. The owner/operator shall submit a renewal application at least 90 days before the expiration date of this certification. This certification shall expire on August 17, 2009\_\_\_\_\_.

Submit all required documentation to:

Attention: Resource Recovery Facility Engineer Missouri Department of Natural Resources Hazardous Waste Program, Permits Section P.O. Box 176 Jefferson City, MO 65102-0176 Mr. Clint Shocklee Page Four

If you have any questions regarding this letter, please contact Mr. Richard Hock, Environmental Engineer, at the Missouri Department of Natural Resources, Hazardous Waste Program, P.O. Box 176, Jefferson City, MO 65102-0176, or by phone at (573) 751-3553.

Sincerely,

HAZARDOUS WASTE PROGRAM

Robert Geller Director

RG:rha

**Enclosures** 

c: City of St. Louis, Division of Air Pollution Control, Permitting Section St. Louis Regional Office



Matt Blunt, Governor - Dayle Childers, Director

### T OF NATURAL RESOURCES

www.dnr.mo.gov

June 12, 2007

CERTIFIED MAIL - 7001 2510 0005 3345 4046 RETURN RECEIPT REQUESTED

Mr. Clinton P. Shocklee Environmental Manager Tri-Rinse, Inc. P.O. Box 15191 St. Louis, MO 63110

RE: Notification of Closure of Resource Recovery Facility, RR0573

Classification - R2

Dear Mr. Shocklee:

The Hazardous Waste Program has received and reviewed the following documents dated June 7, 2007, and June 12, 2007. The first document contained sampling results from the containment area where the resource recovery activities took place. The second document contained the necessary steps taken from start to finish regarding closure of the certified resource recovery (RR0573) process and containment area.

From the information submitted, the decontamination of the resource recovery equipment, and the final disposition of the process and containment area is sufficient to meet the requirements of closure under the resource recovery certification RR0573. The department accepts this documentation as proof of closure. The department also wishes to be clear that no further action is required for the resource recovery unit and associated containment area located at 5200 Manchester, St. Louis, MO 63110. Resource recovery certification RR0573 is hereby terminated at this site.

If you have any questions regarding this letter, please contact Mr. Richard Hock, Environmental Engineer, at the Missouri Department of Natural Resources, Hazardous Waste Program, P.O. Box 176, Jefferson City, MO 65102-0176, or by phone at (573) 751-3553.

Sincerely,

HAZARDOUS WASPE PROGRAM

Richard A. Nussbaum, P.E., R.G.

Chief, Permits Section

RAN:rhs

St. Louis Regional Office

ATTACHMENT Dege of

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Title\_

### ENVIRONMENTAL SERVICES

Generator Name: TRI RINSE

## LAND DISPOSAL NOTIFICATION AND CERTIFICATION FORM PHASE IV EPA ID#: malage 505958 State Manifest No. 000 251217 VES

	tor Name: IKI KINGE	EPA ID#: Make 9003	03458	State Manifest No. 900 23 12 17 VES
1. If waste	s is a wastewater (see 40 CFR 268.2) place "w"	next to the applicable code(s)		Profile #
		etter from section 8 before each code that applies) (See 40 (		
	Hi-TOCD008 Lead acid ba		o RMERC Res.	U151 Hi Hg
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	Reactive SulfideD009 Hg<260		o Inc. Res.	0240 2,4 631013 & 64113
Barrer Co.	ExplosiveF025 Light ends		o RMERC Res.	
D003	Water ReactivesF025 Spent filter	K106 > 260 ppm HgP092 N	Not Inc./RMERC Re	<b>2</b> \$.
100 to 10	Unexp Ord. EmgK006 Hydrated		Hi Inc/RMERC Res.	
The state of the s	Other ReactivesK006 Anhydrous  Batteries K069 Calcium Sult		o Not RMERC Res	S.
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	ON CODES (Place appropriate letter from section		i. Li treated in CV	VASDVVA lacility
D002	P012P030P051P098	P105	F009F0	010F011F012F019F039
D004	D005D006D007D008	D009D010D011D012D013	D014D0	
D020	D021	D025	D030D0	031D032D033D034D035
D036	D037	D041D042D043F001F002	_F003 _F0	
U007	U044	U108	U154U1	188U213U220U226U279
ADDITION	NAL CODES (Enter all codes not identified above	e which are associated with waste)		K061
4. (	USEPA HAZARDOUS WASTE CODE(S)	5. TREATMENT STANDARDS FOR NON-PHASE II S (INDICATE THE APPLICABLE TREATMENT STANDAR	RD 268.41, 6. HC	OW MUST THE WASTE BE MANAGED? ENTER THE LETTER FROM BELOW.
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To identife	F030 or LIHCs managed in non CWA use the	*F039/Underlying Hazardous Constituents Form" provided	and shock bere	
	s are present upon generation check here:	P033/Officerlying Hazardous Constituents Form provided	and check here	_
	ditional EPA waste code(s), use the supplement	al sheet and check here. In lieu of supplemental sheet	vou mav use multir	ple copies of this form.
8.	And the control of th	R program may have regulatory citations different from the	40 CFR ciations list	ted below. Where these regulatory citations
		er to those state citations instead of the 40 CFR citations.)		
A. or √	This waste must be treated to the applicable	IEN I treatment standards set forth in 40 CFR Part 268.40.		
		debris is subject to the alternative treatment standards of 40	CED Dart 268 45	н
B.1	RESTRICTED WASTE TREATMENT TO PE		CFR Fait 200,45.	
		conally examined and am familiar with the treatment technology	ogy and operation	of the treatment process used to support
	this certification. Based on my inquiry of tho	se individuals immediately responsible for obtaining this info	rmation, I believe	that the treatment process has been
		comply with the treatment standards specified in 40 CFR 26		2 3 3 4 5 7 1 4 5 7 1 5
	TO A COLD TO A A POST OFFICE OF A COLD AND	s for submitting a false certification, including the possibility	of a fine and impris	sonment."
B.2	(CERTIFICATION REMOVED BY PHASE IV			
B.3	GOOD FAITH AND ANLYTICAL CERTIFICA	Sonally examined and am familiar with the treatment technol	logy and operation	of the treatment process used to support
		se individuals immediately responsible for obtaining this info	100.0	
		on units as specified in 268.42, Table 1. I have been unable		
	having used best good faith efforts to analyz	e for such constituents. I am aware that there are significant	t penalties for subn	nitting a false certification, including the
	possibility of fine and imprisonment."	·		
B.4		REATMENT FOR UNDERLYING HAZARDOUS CONSTIT		
		has been treated in accordance with the requirements of 40		
	SACROPHICAL STREET, SACROPHICAL SACROPHICA	ing hazardous constituents that require further treatment to		atment standards. I am aware that there are
•		rtification, including the possibility of fine and imprisonment.	-	
C.	RESTRICTED WASTE SUBJECT TO A VAI	RIANCE ariance, a treatability variance, or a case-by-case extension	Enter the effective	ve date of prohibition in column 5 above
		ariance, a treatability variance, or a case-by-case extension boris is subject to the alternative treatment standards of 40 C		e date of profilement in column above.
D.		POSED WITHOUT FURTHER TREATMENT		
		sonally examined and am familiar with the waste through and	alysis and testing o	or through knowledge of the waste to support
		the treatment standards specified in 40 CFR Part 268 Subp		
		e are significant penalties for submitting a false certification	, including the poss	sibility of a fine and imprisonment."
E.	WASTE NOT CURRENTLY SUBJECT TO F			
	This waste is a newly identified waste that is	not currently subject to any 40 CFR Part 268 restrictions.		
I hereby o	certify that all information in this and all associate	ed documents is complete and accurate, to the best of my kr	nowledge and infor	rmation.
, (	, and an addition	The second my to	g = 10 11 101	CHMENT 1 Page 2 of 5
Signature			ATTA	CHMENT Page of
		11		-

Date 11-5-07

Form # OES-78B

55804

		type. (Form desig	1. Generator ID N		winer.)	2 Page 1 of 2 1	momonay Posnons	o Phono	A Manifest		- 11	. CIVID IVO.	2000-0039
	WA	ORM HAZARDOUS ASTE MANIFEST	MOC	ESOG		1 (	8. Emergency Response Phone 000138567 VES						
		nerator's Name and Mailir	ng Address			Gen	erator's Site Address	(if different to	nan mailing addre	ss)			
	14	( RINSE INC 00 SOUTH 2ND INT LOUIS MO 6	33110										
		ator's Phone: 314											
1		nsporter 1 Company Nam							U.S. EPA ID I	Number	1		
1		OLIA ES TECHN		TONS LLC							0 6 3	1 3	6.8
I	7. Tran	nsporter 2 Company Nam	ie						U.S. EPA ID I	Number			
ŀ	0 D		10% 411		, f'x*	* "			110 551 15		· · · · · · · · · · · · · · · · · · ·		
١		ignated Facility Name an OLIA ES TECHN		ONETTO					U.S. EPA ID I	Number			
I	#7	MOBILE AVE	Serie Descri	TWING LULE									
١		UGET IL 62201	MATE BEE						1				
ŀ	Facility		1)271-2804							008	866	124	2 4
	9a. HM	9b. U.S. DOT Description and Packing Group (if a		r Shipping Name, Ha	azard Class, ID Numb	ber,	10. Conta		11. Total Quantity	12. Unit	13.	Waste Code	es
ŀ				Sandal WAST FOR SANDS			No.	Туре		WL/VOI.		L .	
		NON-REGULA WASTE CO N.O.S. (FT	Reosiv Ne phon	E LIGHT	DIACIDIC	ORGANIC,	001	· TT .	5000	G	NGHE	2002	
	-	2.	tres I trate	1 6 6 6 6 6 6	HOLDS, 4	W 256-111		-	11	0	<del>                                     </del>	-	
									्यु विविव्यास्त्र विविद्यास्त्र विविद्यास्त्र विविद्यास्त्र क्षा विविद्यास्त्र क्षा विविद्यास्त्र क्षा विविद्य स्त्र विविद्यास्त्र क्षा विविद्यास्त्र क्षा विविद्यास्त्र क्षा विविद्यास्त्र क्षा विविद्यास्त्र क्षा विविद्यास				
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Ī		ecial Handling Instruction				* *							
	1. 2	96227 NON HAZ	HONSE WA	IER									
l						*							
		a service company and a service service				*		*6.					
1	5. G	ENERATOR'S/OFFERO	R'S CERTIFICATIO	N: I hereby declare	that the contents of	this consignment are fu	ly and accurately de	scribed abov	e by the proper sh	hipping nam	e, and are cla	ssified, paci	caged,
	E	arked and labeled/placar corter, I certify that the c	ontents of this cons	signment conform to	the terms of the atta	ched EPA Acknowledge	ent of Consent.	1		. II export s	niprnent and i	ani die Piai	sast y
L	_	certify that the waste mini		identified in 40 CFR	262.27(a) (if I am a			all quantity ge	nerator) is true.				
19	Senera	tor's/Offeror's Printed/Typ	ped Name			Signatún		lad	2.			nth Day	
Ļ		DAN H( mational Shipments	DAGES	)			Jan X	De m	The formation of the same		0	811	5101
			Import to	U.S.		Export from U.S.	Port of er	•	<i></i>				
-	_	orter signature (for expor		riala			Date leav	ing U.S.:		)			
	*	rter 1 Printed/Typed Nga		IEIS		Signature	7	-	-//		Мо	nth Day	Year
		1=1	200 A	Rince	0	1	1	10			K	81/4	167
7	ranspo	orter 2 Printed/Typed Nam	ne	MVVV		Signatur	1		-		Mo	onth Day	Year
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1	8. Disc	repancy					- 1			-	107		1.1
1	8a. Dis	crepancy Indication Spa	00 VD	thy . Tr	. Пъ-	000	Pacidus	c1/	Partiel Re	iortion	1	Full Re	lection
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	Par	VEND DY	O.T. AN	DADD	2002	PER CUN	Markest Reference	e Number:	E 8/13	5/07	Ma	lle	
1	8b. Alta	ernate Facility (or Genera	ator)						U.S. EPA ID I	Number	9		
١			***	· · · · · · · · · · · · · · · · · · ·		*			· .			* .	
_		Phone:			:						- 11	# D-	. V
1	8c. Sig	nature of Alternate Facilit	ty (or Generator)								"	onth Da	y Year
												1,275	1.
1	9. Hazı	ardous Waste Report Ma	nagement Method	Codes (i.e., codes fo	or hazardous waste t	reatment, disposal, and	recycling systems)		14				
1	+	4011)		۷.		3.	1		4.				
_		gnated Facility Owner or	Operator: Certifica	tion of receipt of haz	ardous materials co	and the same of the same of		m 18a					
P	rinted/	Typed Name	N	. 11		Signaturn		-		1	1 .	onth Day	Year
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1	ormi 8	700-22 (Rev. 3-05) P	revious editions a	are obsolete.		5 7 1	/	1 7	DESIGNAT				RATOF
								)	4	31-5	2512	1 4	
							100		Pony	1 1	- 11	1 1	



# Stratospheric Ozone – Class I and II Controlled Substance Destruction Verification Notification (40 CFR 82.13(k) and 82.24(e))

Pursuant to 40 CFR 82.13(k) and 40 CFR 82.24(e), Veolia ES Technical Solutions LLC., - Sauget Facility is required to provide a verification that Class I and/or Class II Controlled Substances will be used in processes that result in their complete destruction.

Any Class I and/or Class II Controlled Substance shipped on the attached manifest will be completely destroyed by:

Veolia ES Technical Solutions LLC. – Sauget Facility 7 Mobile Avenue Sauget, IL 62201

Any Class I and/or Class II Controlled Substances shipped on the attached manifest will be completely destroyed no later than one year after the receipt of the Class I and/or Class II Controlled Substance(s) at Veolia ES Technical Solutions LLC. – Sauget Facility

Signature: Christie Marcy

Date: 8 89 07

Sant

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039 4. Manifest Tracking Number 2. Page 1 of 3. Emergency Response Phone Generate ID Number UNIFORM HAZARDOUS 00011683 WASTE MANIFEST (800)535-5053 MOCESQG Generator's Site Address (if different than mailing address) 5. Generator's Name and Mailing ddress TRURINSEINC 1400 SOUTH 2ND SANT LOUIS MO 83 110 Generator's Phone: 314 84 -833 U.S. EPA ID Number 6. Transporter 1 Company Name VEOLIA ES TECHNICAL SOLUTIONS LLC 10080631 U.S. EPA ID Number 7. Transporter 2 Company Name 8. Designated Facility Name and Site Address U.S. EPA ID Number VEOLIAES TECHNICAL SOLUTIONS LLC #7 MOBILE AVE SAUGET IL 62201 Facility's Phone: (619)271-2904 D 0 9 8 6 4 2 4 2 4 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, 10. Containers 11. Total 12. Unit 13. Waste Codes and Packing Group (if any)) НМ Quantity Wt./Vol. No. Туре 1. HON-REGULATED BY DOT, NOT RORA WASTE CO RROSIVE LIQUID, ACIDIC, ORGANIC, NONE Dogs GENERATOR 001 TT **K301** N.O.S. LETHEPHON, CITRIC ACID) & UN 3265, TTI 14. Special Handling Instructions and Additional Information 1. 296227 NON HAZ RINSE WATER 15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true. Generator's/Offeror's Printed/Typed Name Signature 1009 16. International Shipments Export from U.S. Port of entry/exit: Transporter signature (for exports only): Date leaving U.S.: 17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name Month Signature Day 300 0 Transporter 2 Printed/Typed Name Signature Month 18. Discrepancy Page 18a. Discrepancy Indication Space Quantity Partial Rejection \_\_\_ Full Rejection DOOZ PER CLINTONMANITEST Reference Number: 7/2 1/07 Stales AMEND DOT 18b. Alternate Facility (or Generator) ATTACHMENT Facility's Phone: DESIGNATED 18c. Signature of Alternate Facility (or Generator) Month Day 19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) 20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a Signature Month Day Printed/Typed Name EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete. DESIGNATED FACILITY TO GENERATOR

lea	se print or type. (Form designed for use on elite (12-pitch) typewriter.)					_			OMB N	0. 2050-0039		
1	UNIFORM HAZARDOUS WASTE MANIFEST MSD 066106923	2. Page 1 of 1		gency Response 800 424		4. Manifest		914	8 .	IJK		
	Generator's Name and Mailing Address PLATTE CHEMICAL COMPANY Generator's Site Address (if different than mailing address)											
	917 PLATTE ROAD GREENVILLE, MS 38704 (662)335-3394											
	Generator's Phone: 6. Transporter 1 Company Name	U.S. EPA ID Number										
	TRISTATE MOTOR TRANSIT COMPANY 7. Transporter 2 Company Name						MOD095038998					
	7. Hansporter 2 Company Name		U.S. EPA ID Number									
8. Designated Facility Name and Site Address TRI-RINSE INC 1400 South 2nd Street St. Louis, MO 63104 (314)647 8338 Facility's Phone:  U.S. EPA ID Number  U.S. EPA ID Number  U.S. EPA ID Number  MOR 000505958												
												9a. 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number,
	HM and Packing Group (if any))  X Waste Carbamate Pesticide, Solid, Tox	cic.		No.	Туре	Quantity	Wt./Vol.	ol.				
GENERALOR	(methomy1), 6.1, UN2757, PGIII					010	_	P066	S and complete the constitute			
NER	(residue last contained)		$\overline{A}$	192	DF	219	P			+		
2												
	3.									+		
	4.						<del> </del>					
	14. Special Handling Instructions and Additional Information											
	((1) RCRA empty Methomyl poly drums											
										ĺ		
	15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of thi marked and labeled/placarded, and are in all respects in proper condition for transport ac Exporter, I certify that the contents of this consignment conform to the terms of the attach I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a lar	ccording to applicated EPA Acknowle	able inter	national and nation of Consent.	onal governme	ental regulations						
	Generator's/Offeror's Printed/Typed Name  GARY PETTY		nature	7	1	00		Mor		ay Year		
1	16. International Shipments		100	my (	PO	47		1	0 3	1 07		
I I	Import to U.S.  Transporter signature (for exports only):	Export from U.	1.5.	Date leaving		<b>- Y</b>						
Y I EL	17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name	Sign	nature	5				Mor	nth D	ay Year		
IKANSPORIER	Stewar North							1.	5 3	107.		
IKAN	Transporter 2 Printed/Typed Name	Sign	nature					Moi	1tn D	ay Year		
1	18. Discrepancy											
	18a. Discrepancy Indication Space Quantity Type			Residue		Partial Re	jection		Full F	Rejection		
	40h Allowski Forith (or Consider)		Ma	anifest Reference	Number:	U:S. EPA ID	M. mak a a	· ·				
1	18b. Alternate Facility (or Generator)					0:3. EFA ID	Number					
D LA	Facility's Phone: 18c. Signature of Alternate Facility (or Generator)		Month Day Year									
MAIL	100. Signature of Allerhate Facility (of Generator)							IVIC		leai		
DESIGNALED FACILITY	19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste tree		, and rec	ycling systems)		Τ,			_			
ı D	1.   2.	3.				4.				Day Year		
	20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials cove	•		ot as noted in Item	18a			Mo	nth D	ay Year		
1	MARK DEAK	Sign	nature	an)	<u></u>	Series Services		1 1	1   0			
=	1											

11:00 (10) 07-2788

> Waste Liquid Waste Sludge

(M) 116

Container Processing Production Order Job# Sales Rep: MK 10/30/2007 Date: 1. JOB DESCRIPTION Customer: DuPont Company Check box #/Units Plastic type Shipping Location Processing Type Type Size Plastic Class below Platte Chemical Rinse & Destroy X 55GL 917 Platte Road **Destroy Only** Greenville, MS 38704 Rinse & Return Sampling Required Scope Of Work Inspect container for residual product, if found notify shipping/receiving dept. Rinse, grind and recycle 55 GL plastic Rinse, crush and recycle 55 GL steel Must be in process within 24 hrs of receiving at our facility Rinsewater needs to be segregated from other projects & labeled Hazardous waste see Clinton for specifics Manifest must be signed and driver keeps transporter copy. Remaining copies must be given to Clinton. 2. Safety/PPE Requirements Level 2 Level 1 **Prior Contents** Methomyl Special Req. Reactive Chemicals: Comments 3. Subcontractor Info Vendor Phone Item Price Unit Contact 4. Production Summary Total Units Received Total Units Processed Total Manh #Units Rinsed Grind Shred Crush Other STEEL 188 5. Waste Info **Initial Product Consolidation** Yes No Type Of waste Haz Est Gal. Est. Drums Actual Gals Act. Drums Rinsewater

Plea	se print or type. (Form designed for use on elite (12-pitch) typewriter.)							MB No. 2050-0039		
1	WASTE MANIFEST NYDOOZ 126845		rgency Response		4. Manifest	_	umber 4814	FLE		
	5. Generator's Name and Mailing Address		or's Site Address	if different th	an mailing addres	ss)				
160 Niagara ST Middleport, Ny 14105  Generator's Phone: 7/6-735376/										
Generator's Phone: //o-/50 7/6/ 6. Transporter 1 Company Name  U.S. EPA ID Number										
To Nawlanda TANN Transport Services U.S. EPAID Number 1. Transport Services U.S. EPAID Number 1. Transporter 2 Company Name U.S. EPAID Number 1. U.S. EPAID Number 1. S. EPAID Number 1.										
8. Designated Facility Name and Site Address  TRIRE Finite Fre.  MORO00505958										
	1402 South 2nd St. IT. Louis, Mo 63104									
	9a. 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	,	10. Contain	ers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Was	ste Codes		
۳ ا	1 RQ, WASTE Carbamate Pesticids	Solid	~	71	EST		P189			
GENERATOR	* Toxic, 6.1 UN2757, Pi	89	102	DM	5000	P				
GENE	2 Non DOT resulaTed empty droms				ELT					
	Last containing Cadusa fos		1/	DM	600	6				
	3. Non DOT regulated empty droms		2		EST					
	Last containing		3	DM	140	P				
	14. Special Handling Instructions and Additional Information	***************************************					0 = 1			
	Commorcially empty containers for Emergency Contail - Robert Wotch	- resi	ource a	recol	revy.		es 1:	>/		
							W)-	P6 III		
	15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consign marked and labeled/placarded, and are in all respects in proper condition for transport according to	applicable into	ernational and nation							
	Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Ar I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantificant Generator's/Offeror's Printed/Typed Name			ll quantity ge	nerator) is true.		Month	Day Year		
$ \downarrow$	Robert C. Worcin	1/6	twe	2n	in	/	199	100		
INT	16. International Shipments Import to U.S. Export	from U.S.	Port of ent				10	101/07 R		
_	Transporter signature (for exports only):  17. Transporter Acknowledgment of Receipt of Materials	6:	Date leaving	ng U.S.:						
TR ANSPORTER	Transporter Printed Typed Name	Signature	1/11/7	Til	MIN		Month	Day Year		
S ANS	Transpoller 2 Brinted/Typed Name	Signature 1	an /		any.		Month	Day Year		
Ë ↑	18. Discrepancy .							M		
	18a. Discrepancy Indication Space Quantity Type	1	Residue		Partial Rej	ection		Full Rejection		
	P-189 -> 3- hour CARUSATOS -> 12 h	ory ,	lanifest Reference	Number:				N		
:: IT	18b. Alternate Facility (or Generator)	1			U.S. EPA ID N	Number		1		
D FAC	Facility's Phone:					1100		Z		
VATE	18c. Signature of Alternate Facility (or Generator)						Month	Day Year		
DESIGNATED FACILITY	19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, di		cycling systems)		14			T C		
٦	1.	3.			4.			Day Year		
	20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the Printed/Typed Name	manifest exce	pt as noted in Item	18a			Month	Day Year		
<b>↓</b>	MARK DEAK	1 det	2				10			

07-2727

Job#

900°0 (122×28°0) 4316°0 (3×300°0)

01-2101						- //	114	
		Container Proces	ssing Prod	uction Ord	der	( 0	70	
Job# FMC	727	Sales Rep: JS				Date:	10/1/200	7
1. JOB DESCRIPT	ION						,	
Customer FMC Corp	oration						3	
Shipping Location		Processing Type	Check box below	Type	Size	#/Units	Plastic type	Plastic Class
Hwy 17 East		Rinse & Destroy		Steel	55gal			
Wyoming, IL		Destroy Only						
0		Rinse & Return						
		Sampling Required		Procedure	е			
Scope Of Work	in							
Rinse/crush 55gal I	P-listed drums							
		THIN 24 HOURS OF						
Verbal ap	proval fr	om MK 40,	recense	PUST	was	ed beg	oce Ulb	ul
	itten U					U		
	,	,						
Production Quota	100 per hour	/						
# of personnel	3							
2. Safety/PPE R	equirements							
Level 1	Level 2	Level 3						
<b>Prior Contents</b>		udan			/	1	j ,	
Special Req.	Vellow +	v Deks, res,	pirato	15 ta	ped			
Reactive Chemicals:	101				,			
3. Subcontracte	or Info						_	
Vendor	Contact	Phone	Item		Price	Unit		
Veolia					260	dren	2.	

						_			
4. Prod	luction S	ummai	y				$\overline{\mathcal{L}}$		_
Total Units	s Received		Total Unit	s Processed		Total Manhrs		8 /	Dates Processed
Туре	Size	#Units	Rinsed	Crush	Grind	Shred		Other	10-3-07
STEEL	55GA	122	122	122					
			1						7
		<b>†</b>					$\vdash$		
5. Was	te Info						_		341600 (122
									23 6 2

No

Type Of waste Haz Est Gal. Est. Drums Rinsewater 165 X Waste Liquid Waste Sludge

Actual Gals | Act. Drums

		sor
-	-	 

**Initial Product Consolidation** 

Comments

Ple	ase pri	nt or type. (Form designed for use on elite (12-pitch) typewriter.)						m Approved.	OMB No. 2	2050-0039
1		OKINI HAZAKDOOS	_	ergency Response		4. Manifest	Tracking N	lumber	10 [	
		ASTE MANIFEST   M S D 0 6 6 1 0 6 9 2 3   2 Perestor's Name and Mailing Address		ator's Site Address				6834	40 F	
	PI	LATTE CHEMICAL COMPANY per DUPONT	Cenen	ator a one Address	(ii dillerent u	ian mailing addres	55)			
	93	B1 PLATTE ROAD, P.O.BOX 5156								
	Gener	reenville, MS 38704 (662)335-3394	1							
1	b. Ira	nsporter i Company prame				U.S. EPA ID N		20		
	7 7	RISTATE MOTOR TRANSIT CG.				M00095		98		
	7. Irai	isponer 2 Company Name				U.S. EPA ID N	Number			
١	8. Des	signated Facility Name and Site Address				U.S. EPA ID N	Number			
	1	RI-RINSE, INC.				0.01 =				
l		400 SOUTH 2ND STREET								
	Facilit	T_LOUIS,MO 63104 (314) 647-8338				MOR O	0050	5958		
	9a.	<ol> <li>U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))</li> </ol>		10. Contai	ners	11. Total	12. Unit	13.	Naste Code:	,
	НМ			No.	Туре	Quantity	Wt./Vol.		I	
S R	x	Waste Carbamate Pesticde, Solid, Toxic (methomyl residue),6.1,UN2757,PGIII		129	DF	3870	P	P066		
RAT	^	(Lannate tech poly	v)		Dr				and the state of t	
GENERATOR		Waste Pyrethroid Pesticide, Solid, Toxic								
5		(esfenvalerate),6.1,UN1339,PGIII		(56)	DM	2912	P			The Astrophysical Control of the State of th
		(residue last contained -A	SANA)					1		
ı	x	Waste Methanol, 3, UN1230,PGII				456		10001	1	
		(residue last contained) Methanol		(8)	DM	430	P		\	Politica de la constitución de l
		4.	7			10	-		1119	6
	X ~	Waste CARBAMATE PESTICIDE, LIQUID, TOXIC	h. no.	0	7016	Xq	P	P194	9001	
		FLAMMABLE (Oxamyl, Cyclohexanone), 6.1, UN29	91,PGI		DM		P /		į	
		ecial Handling Instructions and Additional Information  Lannate tech poly drums P066 (CMBST)	<del>QR/</del>	<del>Vydate z</del>	netal_	drums (no	1-1	iner)	P	
		. Asana metal tech drums								
	-	. Methanol metal (COMMERCALLY	Y EMPTY	contair	ers f	or resou	rce	recove	cy)	
		ENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consig								
		arked and labeled/placarded, and are in all respects in proper condition for transport according I xporter, I certify that the contents of this consignment conform to the terms of the attached EPA			ional governm	nental regulations.	If export s	hipment and I a	am the Prima	iry
	10	certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quan	ntity generator) o	or (b) (if I am a sma					th Davi	
		ntor's/Offeror's Printed/Typed Name RY PETTY	Signature	1.	Dott	1		Mor	,	Year   2007
<b>+</b>		ernational Shipments	1 CA	my 7	Los			13	111	12007
2		Import to U.S. Expo	ort from U.S.	Port of en Date leavi					-	
2		nsporter Acknowledgment of Receipt of Materials		/Date leavi	iig 0.5				1	
-	Transpo	orler   Printed/Typed Name	Signature	11	0 -	+ 11		Mon	th Day	Year
2	_/	Tay HOCKSTEATER	1/10	y Hoc	M	selle	2.	0	91//	07
N A	Iransp	orter 2 Printed/Typed Name	Signature					Mor	in Day	Year
=	19 Die	repand								
		crepancy screpancy Indication Space						Г	7.	
	iva. Di	Quantity Type	1	Residue		Partial Rej	ection	L	Full Reje	ction
			A	Manifest Reference	Number:					
إ	18b. Alt	emate Facility (or Generator)				U.S. EPA ID N	lumber			
		s Phone: gnature of Alternate Facility (or Generator)						Ma	nth De	Voor
2	100. 310	inature of Arternate Facility (of Generator)						Mo I	nth Day I	Year
	19 H27	ardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment,	disnosal and ro	cycling systems)						
3	1.	2.	3.	oyomiy ayatems)		4.				
-										Year
		ignated Facility Owner or Operator: Certification of receipt of hazardous materials covered by th	he manifest exce	ept as noted in Iten	n 18a					
		Typed Name	Signature	(	T			Moi		Year
	L	ANCE TARMAN	1 da	ne	Jan	var		10	1119	107

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ocessing Production Order

									111		
				Container	Proces	sing Produ	uction Or	der	r (		
Job#	Dup	666		Sales Rep:	JAS				Date:	9/7/200	7
1. JOB D	ESCRIPT	ION		•						,	
Shipping L	ocation			Processing	Type	Check box below	Туре	Size	#/Units	Plastic type	Plastic Class
Platte Chem				Rinse & Des		X	1.750	55GL	200		7 lastic class
17 Platte F				Destroy Onl							
Greenville, I	-			Rinse & Ret							
				Sampling Re			Procedu	re			
Scope Of V	Vork						_				
	-	or residual	product.	if found not	ify shippin	g/receiving	dept. Rins	e, grind a	nd recycle	55 GL plas	tic
		ecycle 55 (			, , ,	<u> </u>					
				eiving at ou	r facility						
						abeled Haza	rdous was	ste see Cli	nton for sp	ecifics	
						Remaining					
		equiren									
Level 1				Level 3							
Prior Conte	ents	Meth									
Special Re	q.										
Reactive C	hemicals:		Comment	s							
3. Subc	ontracto	or Info								_	
Vendor		Contact		Phone		Item		Price	Unit	]	
		1									
										1	
										_	
4. Prod	uction S	ummar	ר			_		$\rightarrow$	<b>-</b>		
Total Units	Received	193	Total Unit	Processed	193	Total Manhr	5 (	4	9-12	-6 /	
Туре	Size	#Units	Rinsed	Crush	Grind	Shred	Ott	her	_		
Drum	55	-	193	64	129				4		
	-	-	-	-					$\dashv$		
			-	-					-	1/2425	50 /
	+	<del> </del>	<del> </del>	<del> </del>			-		-	5400	60 (193x22
	+	+	-	<del> </del>			-		-	14/06.7	2 (2×270 0 Freigh
F Man	a lufa									13/197	- Flesh
5. Wast			V							USTIN	
initial Proc	duct Conso	olidation	Yes		. No		_				
:		T.,	Ī ·	T	1		Т	$\neg$			
Type Of w	aste	Haz	Est Gal.	Est. Drums	1		Act. Dru	ms			
Rinsewater		-		-	1	110	12	_			
Waste Liqu	id										
Waste Slud	dge										

	ase p	rint or type. (Form designed for use on elite (12-pitch) typewriter.)				•		n Approved.	OMB No	0. 2050-0039					
1	75500000	IFORM HAZARDOUS 1. Generator ID Number	2. Page 1 of 3	. Emergency Response		4. Manifest	Tracking N	umber	0 1						
П		VASTE MANIFEST IADO00678144	1	800-424-9		100	443	058	8 J	JIN					
	5. G	enerator's Name and Mailing Address	G	enerator's Site Address	•	-	ss)								
		Helena Industries, Inc.	/	3525 Vai			047			1					
1		P.O.Box 5004, Des Moines, IA 50	306	Des Mo	oines,	IA 50	317								
1	Gen	erator's Phone: 515-262-8299 ransporter 1 Company Name				U.S. EPA ID N	lumbor								
	0. 11					12		7006							
١	7 Tr	ransporter 2 Company Name		ILR000107086											
	1	ansporter 2 company Name		U.S. EPA ID Number											
1	8 De	esignated Facility Name and Site Address				U.S. EPA ID N	dumber								
١		TRI-Rinse, Inc.				0.0. EI NID I	tulliber			1					
١		1400 S. 2nd, St.Louis, MO 63110				MOD 1	22604	721							
ı	Facility's Phone: 314-647-8338														
ALUC POTE CONTRACTOR OF CONTRA					nome	44 7-1-1	40.11.7	Ι							
1	9a. HM	1 15 11 6 77 11	•	No.	Туре	11. Total Quantity	12. Unit Wt./Vol.	13.	Waste Co	des					
1	1.00	1.		1.0.	1,700										
GENERATOR		Residue last contained: Waste, Organo		rus / a		1-00		P039							
RA		Pesticide, Liquid, Toxic, 6.1, UN3018, Po	GII	100	dM	1780	P								
뿐		2.		100		1-									
5															
١															
ı		3.													
		*													
1		4.													
l										+					
l															
١	14. S	Special Handling Instructions and Additional Information													
ı		commercially employ containers for re	esource	recovery				Commercially emppy containers for resource recovery							
١										1					
	45	OFNEDATORIO (SETENDARIO SEDETICIO TENENTE DE LA CALLADA DE													
		GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of the marked and labeled/placarded, and are in all respects in proper condition for transport ac													
		marked and labeled/placarded, and are in all respects in proper condition for transport ac Exporter, I certify that the contents of this consignment conform to the terms of the attach	cording to applicabled EPA Acknowled	le international and nati gment of Consent.	onal governm	nental regulations.									
		marked and labeled/placarded, and are in all respects in proper condition for transport ac Exporter, I certify that the contents of this consignment conform to the terms of the attach I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a lar	cording to applicabled EPA Acknowled rge quantity genera	le international and nati gment of Consent. tor) or (b) (if I am	onal governm Il quantity ge	nental regulations.	If export sh	nipment and I	am the Pri	imary Year					
		marked and labeled/placarded, and are in all respects in proper condition for transport ac Exporter, I certify that the contents of this consignment conform to the terms of the attach I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a lar rator's/Offeror's Printed/Typed Name	cording to applicabled EPA Acknowled rge quantity genera	le international and nati gment of Consent.	onal governm Il quantity ge	nental regulations.	If export sh		am the Pri	imary Year					
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Inv#07-2619

P-LISTET

Container Processing Production Order 072619 Job # Sales Rep: MK 8/17/2007 Date: 1. JOB DESCRIPTION Check box Size #/Units **Shipping Location** Processing Type below Type Plastic type Plastic Class 55 100 apprx Helena Industries Rinse & Destroy drum HDPE Т3 X 3525 Vanadalia Road **Destroy Only** Des Moines, IA 50306 Rinse & Return Sampling Required Procedure Scope Of Work Rinse, Crush & recycle 55 GL steel P-Listed Must be in process within 24 hrs of receiving at our facility Rinsewater needs to be segregated from other projects & labeled Hazardous Manifest must be signed and driver keeps transporter copy. Remaining copies must be given to Clinton. 2. Safety/PPE Requirements Level 1 Level 2 Level 3 P-Listed, yellow tyveks, gloves taped, respirators **Prior Contents** DiSyston Special Req. Cholestrase Inhibitor, Toxic **Reactive Chemicals:** Comments 3. Subcontractor Info Vendor Item Price Unit Contact Phone Illini Environmental 618-397-1234 freight Veolia ES 618-271-2804 Rinsewater disposal 4. Production Summary Total Units Received Total Units Processed 116 Total Manhy Type Size #Units Shred Rinsed Crush Grind Other 90 55 90 14 Drum 30 Tota 5. Waste Info **Initial Product Consolidation** X No Actual Gals Act. Drums Type Of waste Haz Est Gal. Est. Drums 330 Rinsewater X 330 6 168000 (60x 2800 363,75 (45x5,85) 180000 (6x30000) 189750 (Stoight) 42.19 (1x42.19) 5682.94 Waste Liquid Waste Sludge

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Specialists in Environmental Services

October 22, 2007

Mr. Richard A. Nussbaum, P.E., R.G. Section Chief, Permits Missouri Department of Natural Resources Hazardous Waste Program P.O. Box 176 Jefferson City, Missouri 65102-0176

Re:

Generators Hazardous Waste Report

Missouri ID # 042402 Quarter Ending 9-30-2007

Dear Mr. Nussbaum:

Attached is a copy of the above referenced quarterly report, please forward to Richard Hock of the Resource Recovery Program.

Sincerely,

Clinton Shocklee

**Environmental Manager** 

Tri-Rinse Inc.

Attachment (1)

TRI RINSE, INC.

1402 South Second St. St. Louis, Missouri 63104 Telephone (314) 647-8338 FAX (314) 647-5028



## **GENERATOR'S HAZARDOUS WASTE** SUMMARY REPORT - PART I

INC.	
ochlee	
on d St.	
STATE	ZIP CODE
MO	63104
	GENERATOR'S MISSOURI I.D. NUMBER
191518	01412141012
	ox STATE

TO THE SITE WHERE WASTE IS PRODUCED. YOU MUST NOTIFY THE DEPARTMENT IF THE

	ADDRESS FOR THE SITE OF	GENERATION CHANGES.	
NOTE PLEASE READ INSTRUCTIONS AND EIT	THER PRINT OR TYPE		
SECTION A - REPORT IDENTIFICATION (Complete Ite	em 1 or Item 2, NOT BOTH)		
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7/1 (YEAR) to 6/30 (Y	☐ 3/31 (YEAR)	☐ 6/30 (YEAR)	1_0F_3
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NOTE: Complete only those items where the information	has changed.		
4. GENERATOR'S NAME  HAS CHANGED			
5. GENERATOR CONTACT PERSON (NAME)  HAS CHANGED		TELEPHONE NUMBER   HAS	S CHANGED
6. MAILING ADDRESS  HAS CHANGED	CITY	STATE	ZIP CODE
7. PLANT SITE ADDRESS	CITY	STATE	ZIP CODE
8. NAME OF PARENT FIRM  HAS CHANGED			
SECTION C - STATUS OF WASTE GENERATED	Same for the Balance Section 2.	nessent ovidtilæsen hvor	The market was a second
9. 10.		11.	
the number of shipments made this reporting period. If greater than zero, tra	EPORTABLE QUANTITY NOT ENERATED. Sign certification and insmit to the department. (Do not implete Part 2)	NOT SHIPPED	QUANTITY GENERATED BUT OFF-SITE THIS QUARTER. Sign I transmit to the department. (Do art 2)
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SECTION E CERTIFICATION STATEMENT			FUPSAVERUES SERVICE - SERVICES AND DE
SECTION E - CERTIFICATION STATEMENT			
I certify under penalty of law that I have personally examin	ed an am familiar with the infon	mation submitted in this	and all attached documents
and that based on my inquiry of those individuals imm			
information is true, accurate, and complete. I am aware	uiat uiere are significant pena	unes for submitting tales	a miormation, including the

PRINT NAME Clint Shocklee SIGNATURE SUNT

10-22-07



MISSOURI DEPARTMENT OF NATURAL RESOURCES HAZARDOUS WASTE PROGRAM P.O. BOX 176

JEFFERSON CITY, MISSOURI 65102 (573) 751-3176

GENERATOR'S HAZARDOUS WASTE

BEFORE COPYING FORM, ENTER THE GENERATOR'S NAME AND IDENTIFICATION NUMBERS AS SHOWN ON PART I.

GENERATOR NAME

TRI-RIASE INC.

EPA ID NUMBER

M1012101010151015191518

MISSOURI I.D. NUMBER

0,4,2,4,0,2

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0	ff-site management facility listed.	□ 3/31 _	(	YEAR) 🗆 6/30	(YEAR)	oF_	2
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3.	FACILITY NAME (NAME OF OFF-SITE LOCATION WHERE WASTE				4. FACILITY'S EPA I.D		
-	Veolia ES Technical	Solutions			ILLD 1	8 64	24
	#7 Mobile Ave.		Taur a		TIPIDMION	4 44	
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Specialists in Environmental Services

October 22, 2007

Mr. Richard A. Nussbaum, P.E., R.G. Section Chief, Permits Missouri Department of Natural Resources Hazardous Waste Program P.O. Box 176 Jefferson City, Missouri 65102-0176

Re:

Facility Summary Report Missouri ID # 042402

Quarter Ending 9-30-2007

Dear Mr. Nussbaum:

Attached is a copy of the above referenced quarterly report, please forward to Richard Hock of the Resource Recovery Program.

Sincerely,

Clinton Shocklee

**Environmental Manager** 

Tri-Rinse Inc.

Attachment (1)

TRI RINSE, INC.

1402 South Second St. St. Louis, Missouri 63104 Telephone (314) 647-8338 FAX (314) 647-5028 ATTACHMENT 14 page 4 of 7



### **FACILITY SUMMARY REPORT** PARTI

BEFORE COPYING FORM, ATTACH SITENTER:	E IDENTIFICATION LABEL OR
FACILITY NAME IRI-RINSE INC.	
CONTACT PERSON (NAME)	
Clint Shocklee	
SITE STREET ADDRESS (DO NOT ENTER P.O. BOX)	
St Louis MO	2IP CODE 63104
FACILITY'S EPA I.D. NUMBER	FACILITY'S MISSOURI I.D. NUMBER
10,0,0,0,0,5,0,5,9,5,8	01412141012
NOTE: THE FEDERAL EPA AND MISSOURI FACILITY LD.	NUMBERS ARE ASSIGNED EXCLUSIVELY TO

THE SITE WHERE WASTE IS HANDLED, YOU MUST NOTIFY THE DEPARTMENT IF THE ADDRESS FOR THE FACILITY SITE CHANGES. NOTE > PLEASE READ INSTRUCTIONS AND EITHER PRINT OR TYPE **SECTION A - REPORT IDENTIFICATION** 1. FOR THE PERIOD ENDING (CHECK ONE & FILL IN YEAR) 2. PAGE IMPORTANT: ALL MISSOURI BASED FACILITIES THAT RECLAIM, TREAT, STORE, OR DISPOSE HAZARDOUS WASTE ON-SITE SHALL REPORT THE 9-30- 2007(YEAR) ☐ 12-31-\_\_\_ (YEAR) TYPE, QUANTITY AND HANDLING METHOD USED FOR EACH WASTE RECEIVED FROM ALL SOURCES. ALL FACILITIES MUST REPORT QUARTERLY. ☐ 6-30- \_\_\_\_ (YEAR) (YEAR) **SECTION B - FACILITY IDENTIFICATION** 3. FACILITY NAME | HAS CHANGED 4. FACILITY CONTACT PERSON (NAME) HAS CHANGED TELEPHONE NUMBER | HAS CHANGED ZIP CODE 5. MAILING ADDRESS | HAS CHANGED CITY STATE 6. PLANT SITE ADDRESS CITY ZIP CODE 7. NAME OF PARENT FIRM | HAS CHANGED **SECTION C - ACTIVITY LEVEL** CHECK HERE IF NO WASTE WAS RECEIVED FROM OFF-SITE, AND NO WASTE WAS GENERATED AND MANAGED ON-SITE. (DO NOT COMPLETE PART II) **SECTION D - COMMENTS SECTION E - CERTIFICATION STATEMENT** 

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

PRINT NAME

Clint Shocklee

10-22-07

FORM DNR HWF-1 ATTACHMENT 14 Page 5 of

MO 780-0408 (5-06)



# FACILITY SUMMARY REPORT PART II

BEFORE	COPYING	FORM,	ENTER	THE	<b>FACILITY</b>	NAME	AND
IDENTIFIC	ATION NUM	BERS AS	SHOWN	ON P	ART I.		

FACILITY NAME

TRI-Rinse IWI-

FACILITY'S EPA I.D. NUMBER M1018101010151015191518

FACILITY'S MISSOURI I.D. NUMBER 0,4,2,4,0,2

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NOTE > PLEASE READ INSTRUCTIONS AND EITH			Y	
SECTION F - REPORT IDENTIFICATION (AS SHOWN ON	PART I)			
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	HOW	IT WAS HANDLED FROM AN INI		
9-30- <u>2002</u> (YEAR)   12-31- (YEAR)   2   3-31- (YEAR)   2	05	E. ADDITIONAL PAGES NEED TO	BE COMPLETED	FOR EACH
	INDI	VIDUAL SOURCE.		
SECTION G - GENERATOR IDENTIFICATION (LIST THE	SOURCE OF THE WA	STE LISTED ON THIS PAGE)		
3. GENERATOR'S NAME		4. GENERA	TOR'S U.S. EPA I.D. N	IUMBER
Helena Industries, IN	<u>/</u> .	T 4 3	20 / 2	
7 .		L   A   D	1010101617	18,1,4,4
5. GENERATOR'S SITE ADDRESS	CITY			
3525 Vandalia RJ.	Des Moines	S IA S	0317	
		EPORTING PERIOD. IF THE WASTE WAS G	ENERATED AND MAN	IAGED ON-SITE,
WAS BOTH GENERATED AND MANAGED ON-SITE - LEAVE BLAN	к. /			
SECTION H - WASTE IDENTIFICATION				
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OF WASTE	WASTE NUMBER	OF WASTE	MEAS. GRAVITY	METHOD CODE
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# **FACILITY SUMMARY REPORT** PART II

BEFORE	COPYING	FORM,	<b>ENTER</b>	THE	<b>FACILITY</b>	NAME	AND
IDENTIFIC	ATION NUM	BERS AS	SHOWN	ON P	ART I.		

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IRI - Rinse INC.

FACILITY'S EPA I.D. NUMBER

M101R101010151015191518

FACILITY'S MISSOURI

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931 Platte RS. Ge	eneon	MS 38	,,,,,	
		PORTING PERIOD. IF THE WASTE WAS GE	NERATED AND MAN	IAGED ON-SITE,
WAS BOTH GENERATED AND MANAGED ON-SITE - LEAVE BLANI CHECK THIS BOX	r. /			
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SECTION H - WASTE IDENTIFICATION				
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8. I DESCRIPTION	9.	10.	11.   12. UNIT	13. MGMT.
N OF WASTE	EPA HAZARDOUS WASTE NUMBER	TOTAL AMOUNT OF WASTE	OF SPECIFIC	METHOD
			MEAS. GRAVITY	CODE
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(Methany residue), 6.1) Wass 1, 75111		3/80		HI1 14,1
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		ATTACHMENT 14	Page 7	of Z
		Productive Communication	0-1	

# **EMERGENCY MANAGEMENT PLAN**

TRI-Rinse, Inc. 1400 South Second Street St. Louis, MO 63104 314-647-8338

Issue Date 7-3-07 Rev 03

#### **FACILITY ADDRESS**

TRI-Rinse, Inc.

1400 South Second Street

St. Louis, MO 63104 Phone: 314-647-8338

# **EMERGENCY CONTACTS – ON SCENE COORDINATORS**

#### **PRIMARY**

Clinton Shocklee - Environmental Manager

Cell: 314-223-9370 Home: 314-842-1321

# 1<sup>ST</sup> ALTERNATE

John Shocklee - VP Operations

Cell: 314-570-5201 Home: 314-570-5201

# 2<sup>ND</sup> ALTERNATE

Mike Kamrath - Containers Manager

Cell: 314-330-4336 Home: 314-849-9623

# 3<sup>RD</sup> ALTERNATE

Doug Wohlstadter - Warehouse Supervisor

Cell: 314-267-9125 Home: 636-461-0254

#### ADDITIONAL EMERGENCY CONTACTS

911
314-289-1900
573-634-2436
314-768-6290
800-424-8802

# TABLE OF CONTENTS

1.0	Overview	4
2.0	Emergency Management Training	6
	Preparedness and Prevention	
	Contingency Plan	
	Emergency Control Procedures	
	Reporting	

#### 1.0 Overview

Tri-Rinse, Inc. (TRI-Rinse) has developed the following program to respond to possible emergencies at the South Second Street facility. This program has been designed to provide employees a set of guidelines to ensure their safety as well as protect the interests of the Company. The hierarchy of values in any potential emergency situation is always:

- 1. Protect yourself,
- 2. Protect your coworkers, and
- 3. If safe and prudent, protect company property.

It is the responsibility of the Environmental Manager (Clinton Shocklee) to coordinate the following program and take any other steps necessary to ensure that the intent of this plan is implemented.

In the event of an emergency: fire, explosion, chemical release, tornado, etc., the following actions will be taken:

#### 1. Emergency Recognition and Communication:

Before attempting to communicate any hazardous conditions, know what all the hazardous conditions are.

#### 2. Emergency Notification:

Upon identification of an emergency event, evacuate the warehouse and notify the main office (314-647-8338). Go immediately to the <u>designated safe area</u> (parking area east of the warehouse) and remain there for further instructions.

#### 3. Initial Reporting:

In the event of an emergency contact one of the following employees as soon as possible:

- Doug Wohlstadter
- John Shocklee
- Clinton Shocklee
- Mike Morgan

It will be the responsibility of one of these individuals to provide direction and make any further notifications that may be required.

Report any chemical exposure or potential exposure to one of the following employees:

- Clinton Shocklee Primary
- Mike Kamrath Alternate

Employees are urged not to make any comments regarding an emergency situation to anyone outside the company. This controls miss-information. Direct all questions from public and the media to Mike Morgan, President.

#### 4. Response Action:

Response action to any emergency event will be dictated by the nature and extent of the event. It will be the responsibility of the On Scene Emergency Coordinator to assess the situation and manage the specific response. Guidelines and general procedures are included within Sections 4.0 Contingency Plan and Emergency Procedures and 5.0 Emergency Control Procedures of this Plan.

#### 5. Site Security and Control:

Employees – Do not go near disaster area unless authorized by Doug Wohlstadter, John Shocklee, Mike Morgan, Clinton Shocklee, or Tim Shocklee. Stay away from danger. Do not allow unauthorized persons to approach site. Report trespassers to John Shocklee, Mike Morgan, or Tim Shocklee.

#### 6. Post Reporting:

Following an emergency event, both internal and external (as required) reporting will be completed.

- John Shocklee will provide a written report submitted to the President, following any incident. The report will summarize the event and offer any recommendations needed.
- Clinton Shocklee will be responsible for completing all external reporting

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# 2.0 Emergency Management Training

Following is a list of emergency related training provided to TRI-Rinse employees. Specific training is a function of duties

#### 2.1 Initial Training

All employees are giving initial health and safety orientation training. As part of this initial effort, employees are trained respective to Hazard Communication and Emergency Awareness.

#### 2.2 Hazardous Waste

Employees responsible for managing waste are provided hazardous waste training. This training includes identification, characterization, packaging, labeling, storage, shipping, and emergency response.

#### 2.3 Emergency Response

For employees responsible for responding to an emergency event, training is provided in accordance with 29 CFR 1910.120 Subparagraph Q (Emergency Response to Hazardous Substance Releases). This training includes hazard recognition, employee and facility safety, personal protective equipment, containment, and remediation.

#### 3.0 Preparedness and Prevention

#### 3.1 Program

The most critical component of any Emergency Management Plan is to establish and implement an effective Preparedness and Prevention Program. The purpose of such a program is to identify potential emergency situations, prepare for response, and continually implement prevention measures to avoid an occurrence.

Due to the nature of activities at TRI-Rinse potential emergency events include:

- Fire
- Chemical Exposure
- Chemical Release

In addition, due to location, potential events also include:

Tornado

#### 3.2 Preparedness and Prevention

TRI-Rinse has established the following preparedness and prevention measures respective to the above-described potential emergency events.

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#### Fire

- 1. Smoking is permitted only in areas designated by the Senior Management of TRI-Rinse, Inc.
- 2. All smoking materials shall be extinguished in ashtrays or designated receptacles.
- 3. Cigarette butts and ignition sources should not be disposed of in trashcans.
- 4. All extension cords, electrical cords should be examined on a routine basis to make sure that they are in good working condition. All frayed electrical cords should be noted and reported to management or maintenance personnel for replacement.
- 5. Heat producing equipment such as pots, ovens and portable heaters should be unplugged at the end of each workday.
- 6. Flammable and combustible substances should be stored away from ignition sources such as pilot lights, heat-radiating sources such as oven, or portable heaters. Lids and covers shall be placed on containers with flammable materials.
- 7. Good housekeeping is a prime importance in fire prevention. All unnecessary combustible materials such as boxes, paper, etc. should be removed from the warehouse and disposed of properly. Combustibles such as pre-made boxes should be kept to a minimum.
- 8. Proper precautions should be taken when welding and burning.
- 9. Portable fire extinguisher can be used for small fires. Employees should familiarize themselves with the operation and location of fire extinguisher in their work areas. In most cases, fire extinguishers are operated by pulling a safety pin on the handle and aiming the nozzle at the base of the fire while squeezing the trigger.
- 10. If the fire cannot be managed by personnel with a fire extinguisher a management official should be told immediately so the appropriate action can be taken and the fire department notified.

### **Chemical Exposure**

- 1. Material Safety Data Sheets are received and reviewed for each type of project.
- 2. Engineering controls are put in place wherever possible.
- 3. Where engineering controls are not practical, appropriate personnel protection equipment is utilized.
- 4. Personnel are trained to recognized potential exposure and take corrective action or initial response as appropriate.
- 5. Emergency coordinators are trained to work with outside first responders as needed.

#### **Chemical Release**

- 1. Material Safety Data Sheets are received and reviewed for each type of project.
- 2. Engineering controls are put in place wherever possible.
- 3. Personnel are trained to recognized potential releases and take corrective action or initial response as appropriate.
- 4. Release response equipment is in place and personnel are trained in its use. Reference Section 3.3 for a listing of available emergency equipment.
- 1. Emergency coordinators are trained to work with outside first responders as needed.

#### **Tornado**

- 1. The Environmental Manager will monitor the Weather Service for pertinent information and warning notices.
- 2. When a weather warning is received, management and/or supervisory personnel will convey the information to the employees.
- 3. Employees should go to interior hallways or along walls away from large windows. Protect head and face.
- 4. Upon safe conditions, an "ALL CLEAR" notification will be given to employees.

#### **Evacuation Plan**

If an emergency arises where the buildings at TRI-Rinse, Inc. need to be evacuated, the evacuation plan is as follows:

- 1. An evacuation order will be given by management and/or supervisory personnel to all employees.
- 2. Designated employees will be instructed to shut down or disconnect all energy sources such as electricity, pneumatic sources of energy, natural gas supply and all other possible sources of energy.
- 3. All employees will exit in an orderly and calm manner from the premises.
- 4. When the evacuation of the buildings is complete, ALL employees will assemble in the parking area east of the warehouse.
- 5. Supervisors will perform a head count of their departments. Any one not accounted for will be reported to the Fire Department personnel immediately regarding their most recent known location.

#### 3.3 Equipment

- A.B.C. Fire Extinguisher's
- Absorbent i.e., Oil Dry, Pigs
- 3.4 Arrangements with Local Responders

The LEPC has been notified and the City of St. Louis Fire Department has toured the facility.

Our Company is engaged in remedial action projects and clean-ups. Therefore, we can adequately handle any emergency response at our own facility, which may be needed. If additional equipment is needed we have an arrangements equipment suppliers to provide equipment.

#### 4.0 Contingency Plan and Emergency Procedures

#### 4.1 Facility Description

Description: The TRI-Rinse, Inc., Warehouse Facility is located at 1400 South Second Street, St. Louis, MO 63104. This facility operates as a warehouse.

#### 4.2 Emergency Response

When there is an imminent or actual emergency situation, the emergency coordinator (or his or her designee, when the emergency coordinator is on call) will immediately:

- 1. Activate internal facility alarms or communications systems, where applicable, to notify all facility personnel; and
- 2. Notify appropriate state or local agencies with designated response roles if their assistance is needed.

Whenever there is a release, fire or explosion, the emergency coordinator will immediately identify the character, exact source, amount and aerial extent of any damage or spill, whether it be chemical release, fire, explosion or other damage. This will be done by observing or reviewing facility records or bill of ladings/manifests and, if necessary, by chemical analysis.

Concurrently, the emergency coordinator will assess possible hazards to human health or the environment that may result from chemical release, fire or explosion. This assessment will consider both direct and indirect effects of the release, fire or explosion (e.g., the effects of any toxic, irritating, or asphyxiating gases that are generated or the effects of any hazardous surface water run-off from water or chemical agents used to control fire and heat-induced explosions.)

If the emergency coordinator determines that the facility has had a release, fire or explosion that could threaten human health or the environment outside the facility, he or she will record the finding as follows:

- If the assessment indicates that evacuation of local areas may be advisable, he or she will immediately notify appropriate local authorities and will be available to help appropriate officials decide whether local areas should be evacuated; and
- 2. Either the government official designated as the on-scene coordinator for the geographical area or the National Response Center (using their 24-hour toll free number 800-424-8802) will be immediately notified. This report must include:
  - a. the name and telephone number of reporter
  - b. the name and address of facility
  - c. the time and type of incident (e.g., release, fire)
  - d. the extent of injuries if any, and
  - e. the possible hazards to human health, or the environment, outside the facility.

During the emergency, the emergency coordinator will take all reasonable measures necessary to ensure that fires, explosions and releases do not occur, recur or spread to other hazardous materials at the facility. These measures will include, where applicable, stopping processes and operations, collecting and containing released material, and removing or isolating containers.

If the facility stops operating in response to a fire, tornado, explosion or release, the emergency coordinator will monitor for leaks, pressure build-up, gas generation or ruptures in valves, pipes or other equipment wherever this is appropriate.

Immediately after an emergency, the emergency coordinator will provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire or explosion at the facility.

The emergency coordinator will ensure that in the affected areas of the facility:

- 1. No more material/waste that may be incompatible with the released material is treated, stored or disposed of until cleanup procedures are completed; and
- 2. All emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed.

TRI-Rinse, Inc. will note in the operating record the time, date and details of any incident that requires implementing the contingency plan. Within 15 days after the incident, a written report of the incident will be submitted to the Regional Administrator, as required.

The report will include:

- 1. name, address and telephone number of the owner or operator;
- 2. name, address and telephone number of the facility;
- 3. date, time and type of incident (e.g., explosion);
- 4. name and quantity of material(s) involved;

- 5. the extent of injuries, if any;
- 6. an assessment of actual or potential hazards to human health or the environment, where this is applicable and
- 7. estimated quantity and disposition of recovered material that resulted from the incident.

#### 4.3 Organizational Structure:

The Environmental Manager is responsible for coordinating the Preparedness Prevention and Contingency Plan. He is responsible for training of employees and for implementing response measures in the event of an incident.

#### 4.4 Material Compatibility:

All of our materials are stored in containers compatible with the products. Drums all conform with D.O.T. requirements and are labeled in conformance with all applicable regulations.

#### 5.0 Emergency Control Procedure

#### 5.1 Fire:

In the case of a fire the person first discovering the fire shall, depending on its size, try to contain the fire using fire extinguishers located in the building, and notify the Emergency Coordinator.

Depending upon the extent of the fire, evacuation of the site may be necessary. The Supervisor in charge, or his designee, shall order evacuation.

Severe Impact - Notify Fire Department for immediate dispatch.

Shut off electric and supply (shut-off location shown on plot plan).

All employees assemble for roll call.

Notify emergency coordinator for cleanup procedure.

#### 5.2 Evacuation:

Upon notification of evacuation, all employees shall progress swiftly yet safely to an exit.

All employees will assembled in the parking area east of the warehouse

Any personnel unaccounted for will be immediately reported to the Fire Department personnel regarding their most recent known location.

Employees shall be given instructions as to the path of travel, hazards to avoid, and location to assemble.

#### 5.3 Chemical Release:

In the event a release should occur, the person observing the release will take immediate action to contain the release. After taking such action, the person will then notify the Emergency Coordinator of the location and communicate the extent of the release. Depending on the size and nature of the release, the Emergency Coordinator will take appropriate action.

Follow evacuation route procedure if determined to be necessary.

Employees will be contacted by their supervisors with instructions regarding response and cleanup actions.

The Emergency Coordinator will have the release covered with absorbent material. This will then be collected and placed in D.O.T. approved drums for disposal in a manner to comply with all Local, State, and Federal Regulations.

A senior management official will be designated to talk to the media present at the scene. This will be the only official to discuss the events with the media.

Supervisors will be responsible for damage assessments of their work areas. The controller will receive these damage assessments and notify the insurance company.

#### 5.4 Injury:

In the case of direct contact with chemical, the skin shall be washed with water. Contaminated clothing removed. If eye contact occurs, the eyes shall be flushed with water. Medical attention shall follow as soon as possible. Material Safety Data Sheets are available for additional information.

In case of physical injury, first aid shall be provided. Based on the seriousness of the accident, the supervisor shall decide whether hospital emergency attention is required and, if so, the method of transporting the victim to the hospital.

#### 6.0 Reporting

#### IF:

- \* The accident posed or poses any potential threat to human health outside the facility
- Any release has reached surface water

Immediately notify the National Response Center (1-800-424-8802)

#### Be prepared to give the following information:

- 1. The name, address, and U.S. EPA Identification Number of the Generator;
- 2. Date, time, and type of incident (i.e. release or fire);

- 3. Quantity and type of hazardous waste involved in the incident;
- 4. Extent of injuries, if any; and
- 5. Estimated quantity and disposition of recovered materials, if any.

### Appendix 1-1

#### DATA GATHERING WORKSHEET AND CHECKLIST INSTRUCTIONS AND KEY

- 1. Complete all items on the applicable data gathering worksheet and checklist in a neat and legible fashion.
- . All responses will be based on the inspector's knowledge and best judgement and information obtained from facility the representative(s) at the time of the inspection.
- 3. A (\( \sigma \)) mark should be used to mark the all boxes (\( \sigma \)) and will indicate the choice made or the action completed.
- 4. The Records Review Worksheet and Checklists and the Visual Review Worksheet and Checklists each have a key below the tables. Use this key when filling out these forms.
- Items which are shaded gray on the worksheets and checklists are considered high priority items during inspections and should always be completed.
- b. On the top of the worksheets and checklists are a group of boxes which represent the generator status of the facility and whether or not the facility is subject to interim status or permit requirements. The appropriate box should be checked.
- 5. The inspector should pay special attention to the questions contained in this box and make sure that they are able to answer them as relates to inspection documentation.

DOCUMENTATION: HOW are the facts known? WHO said what? and WHAT PROOF WAS OBTAINED? WHEN did it happen? HOW long did it happen?

6. Each of the forms has a space at the bottom to indicate the Attachment number and page when the form is included in the report. The attachment number and page should be used when referencing information contained on the form in the inspection report.

#### Appendix 1-2

RE-INSPECTION ITE	WIS TO CHECK		
General Equipment:	<ul> <li>hardhat</li> <li>safety glasses</li> <li>camera</li> <li>calculator</li> <li>GPS unit</li> <li>post-its</li> <li>coveralls</li> <li>film</li> <li>pH paper</li> </ul>	<ul> <li>rubber boots</li> <li>tape measure</li> <li>notebook</li> <li>compass</li> <li>tape recorder</li> <li>safety gloves</li> <li>safety boots</li> <li>ice chest</li> <li>batteries</li> </ul>	<ul> <li>safety shoes</li> <li>back-up camera</li> <li>flashlight</li> <li>binoculars</li> <li>pens/markers</li> <li>winter gloves</li> <li>ear plugs</li> <li>coat</li> <li>respirator</li> </ul>
Special Equipment?:			
		•	
Paperwork:	<ul> <li>NOV, CBI &amp; Rec. for Doc. forms</li> <li>Reference Information</li> <li>Data Collection Worksheets</li> </ul>	- Notification forms - Regulations (Federal/State)	- Multi-Media form - Facility Files
Items Needed:	<ul><li>Load Camera</li><li>Change Phone Message</li><li>Change Phone Message</li></ul>	- Credentials - Car Book/Keys/Credit Card - Sign-out On Board Considerations?	<ul><li>Daily Planner</li><li>Business Cards</li><li>Special Health or Safety</li></ul>
lotes:			
		, 10	

Appendix 1-3
Facility: No Rinse Inc Date: 11/7/07 Arrival time: & 10 45cm
DRIVE-BY
Drive-by conducted from public right-of-way?
2. Determine the direction "North" with respect to the facility and provide a brief sketch of the layout and orientation (as can be viewed from the public right-of-way):
2 red So
3. Obvious concerns visible from public right-of-way (photos)? ☐ Yes ☐ No
- Containers - Tanks - Processing Equipment - Loading Areas - Unloading Areas - Security Devices - Open Drums - Stressed Vegetation - Unusual Staining - Unusual Odors - Obvious Discharges - Improper Disposal - Safety Concerns - Other Concerns
Appendix 1-4 <u>SITE ENTRY AND INBRIEFING</u>
1. □ Used main entrance □ Entered during normal operating hours □ Excessive delays (>15 minutes - denial of access?) - □ No
2. Facility Representative(s): Clinton Shocked Title: BH+5 Mgr.
Mike Vernouth Tim Shockee Title: Owner Salex Myn Calenn Potter Title: Maint Supe
Does representative have intimate knowledge of all waste management practices? Yes   No
How long in position? <u>June 2006</u> grad. May Ob from Univ. Tulsa in Environmental Science
4. Introduction:
Presented credentials  Explained responsibility to provide accurate information and provided copies of Section 1001 and 1002 U.S.C. to
facility  Verified presence at correct facility (checked address/I.D. #)  Explained authority to conduct inspection (Section 3007 of RCRA)  Identified personal safety considerations: handle advised, shed here having protection  Explained the purpose, scope, and order of the inspection  Completed Multimedia screening checklist  Explained documentation process - worksheets, checklists, photo's, notes, statements, etc  Provided SBRFA  Description
Explained facility's right to claim CBI
5. Was full access granted?   Yes   By facility representative or Other(name):
□ No - Access denied Name of person denyingaccess:
Time of denial:
Reason for denial, or limitations placed on access:

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Appenidx 1-5	FACILITY BACKGROUND WORKSHEET
1. Site history:	facility began operating: Same Number of employees: 24 wavelous ~40 total
	aber of shifts/hours worked: 15pl Number of days worked per week: 5pm
1 Size	(sq. ft. how divided):
	~ 235,000 pt2 - operate out in 100,000 ft " trent excess space (
Prop	erty owner and facility operator the same? TYES NO
	Sacres.
2. Major products o	or services provided:
3. Major raw materi	ials used:
4. Major manufactu	ring or processing operations which generate waste streams: (provide brief description)
Operation/Process	Waste Stream(s)
Whising con	itainers wasterinsate
C, S, said on	ul, 5-10% of bizn's regulated containers of the all rinsate is man
as haz we	to when seculated waste drums are rinsed on a particular Day or . it
50 out of 7:	wasterinsete  nly 5-10% of bizzis regulated containers of the all rinsate is man  to when regulated waste drumsare rinsed on a particular day of. to  So drums rinsed in aday, all rinsate from the day is haze west
	18
mont sur	sher maint. 5-K l/m eaxwk-7cal
V	7
=	
	·
	· · · · · · · · · · · · · · · · · · ·
	<del></del>
	erator Waste Stream Worksheet and/or Off-Site Waste Stream Worksheet for the waste streams noted above and

Attachment 16 Page 3 of 13

5. Verified/compared above information with facility Notification Form: PYES   NO
7. GENERATOR STATUS: (based on records review)
□ Non-generator □ CE (0-100kg/mo or 1 kg/mo acute waste and accumulate <1000 kg or 1 kg acute waste or 100 kg of acute spill residue SQG (100-1000kg/mo and accumulate <6000 kg) □ CE (0-1000kg/mo)
Is facility's status solidly within above category? ZYES NO (If not carefully verify status and document)
. TSD STATUS:   □ Treatment □ Storage □ Disposal
Note: Types of units, number of units, capacities, processes, etc.
resource recovery facility in MO.
Resolved questions from Pre-Inspection Worksheet?  VES  NO  No Questions
/
· · · · · · · · · · · · · · · · · · ·
D. Resolved compliance officers questions from Pre-Inspection Worksheet? ZYES \( \subseteq \text{NO} \subseteq \text{No Questions} \)
1. Requested site map or diagram to identify all observations? DYES - None available

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# Appendix 1-6 GENERATOR WASTE STREAM WORKSHEET

1. WASTE STREAM: MZ WST. MISUTE		
FACILITY DETERMINATION: Hazardous Nonhazardous WASTE CODES: 10002 * 10 P-codes in R	-	
DETERMINATION METHOD: product knowledge  Documentation:	□ process knowledge	□ testing
GENERATING PROCESS: Vin se was tenuter from	rinsées when drums	which helpesticide
GENERATION RATE: 10,000 gel 202 d ~ 4.	Toogal P- Visted our	goverted in 5 most
ON-SITE MANAGEMENT: satellites - visually inspected  we satellites - we in process unto	storage Visually inspected	
OFF-SITE MANAGEMENT / DISPOSITION: 1 heinerate	at Veguaes Techs	Soln LC
2. WASTE STREAM: previs wees her solve	nt	
FACILITY DETERMINATION:   Hazardous Nonhazardous WASTE CODES:  Selecty-Kleen ve	Not done of Inadequate  eyeled solvent (Cu	<u>e</u>
DETERMINATION METHOD:   product knowledge  Documentation:	- 1 · · · · · · · · · · · · · · · · · ·	testing
GENERATING PROCESS: 18 wk service inte	ral affected 9/11	107
GENERATION RATE: ~ 7 gal/service		
ON-SITE MANAGEMENT: satellites - visually inspected	storage visually inspected	
OFF-SITE MANAGEMENT / DISPOSITION:	SK cup selver	
3. WASTE STREAM:		- <del></del>
FACILITY DETERMINATION: □ Hazardous □ Nonhazardous □ WASTE CODES:	•	
DETERMINATION METHOD: □ product knowledge  Documentation:  GENIER ATING PROCESS:		□ testing
GENERATING PROCESS:		
GENERATION RATE:		
ON-SITE MANAGEMENT: satellites  visually inspected	storage □ visually inspected	
OFF-SITE MANAGEMENT / DISPOSITION:		

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# Appendix 1-8

#### RECORDS REVIEW WORKSHEET AND CHECKLIST

# A. MANIFESTS

#	✓/ x	REGULATORY REQUIREMENT	MANIFEST #'s AND COMMENTS
1.	1	Facility uses manifest system-262.20(a)	
2.	/	Manifests maintained for 3 years-262.40(a)	
3.	8	Generator EPA I.D. number-262.20(a)	
4.	i/	Generator name, address, phone number-262.20(a)	
5.	. /	Transporter(s) name & EPA I.D. number-262.20(a)	
6.	V	Designate facility name, address & EPA I.D. number- 262.20(a)	
7.	N/K	Alternate facility designated (optional)-262.20(c)	uniform t. W. manifests
8.		Unique five digit document number and number of pages- 262.20(a)	unitorn tr.W. manites
9.	d	DOT shipping name, hazard class, waste code, & RQ (if required-49 CFR 172)-262.20(a)	
10.	1	Containers: numbers, type, quantity, unit wt/vol262.20(a)	
11.	1	Proper certification (highway, rail, water or air) including waste minimization-262.20(a)	
12.		Signed and dated-262.23(a)	
13.	NA	Exception report submitted if necessary-262.42	
14.	,	Waste reclaimed under contractual agreement (SQG only)-262.20(e)(1)	- used solvent from parte washer is 3-K CUP solvens
15.	,	Generator maintains copy of contractual agreement (SQG only)-262.20(e)(2)	
16.	0	LDR notification/certification sent with manifests on 1st shipment -268.7(a)	.*·
17.	N	LDR notification/certification includes: manifest number, correct EPA waste codes & treatment standards, and waste analysis data-268.7	
18.		LDR notification/certification/ waste analysis data & other documents maintained for 3 years-268.7.(a)(8)	. 0.1
19.	8	Biennial Reports submitted per 262.41 (LQG only)	none to Jute

✓-in compliance X-not in compliance N/A-not applicable

20. Approximate number of manifests generated since last inspection, or over past 3 years 3 recent starting this local	7 00
21. Approximate number of manifests reviewed:	
22 Conies of manifests made with regulatory violations? \(\sigma\) VES \(\sigma\)NO	

#	<b>√</b> /X	ADDITIONAL I.S./PERMIT' REGULATORY REQUIREMENTS	MANIFEST #'s AND COMMENTS
a.	V	Manifests signed and dated-265.71(a)(1)	· · · · · · · · · · · · · · · · · · ·
b.	NA	Manifest discrepancies noted and corrected w/in 15 days-265.71(a)(2)	
c.		Copy immediately given to transporter-265.71(a)(3)	
d.		Copy sent to generator w/in 30 days-265.71(a)(4)	
е.		Manifests retained for 3 years-265.71(a)(5)	
f.		LDR notification/certifications retained for 3 years-268.7 (e)(2)	
g.		Biennial Reports submitted per 265.75	

√-in compliance X-not in compliance N/A-not applicable *-please note applicable permit require	√-ii	in compliance	X-not in compliance	N/A-not applicable	*-please note applicable perm	nit requirement
--	------	---------------	---------------------	--------------------	-------------------------------	-----------------

h. Approximate number of manifest received since last inspection _	, or over
past 3 years tat this location	

i. Approximate number of manifests reviewed:

j. Copies of manifests made with regulatory violations? 

YES NO

# **B. PREPAREDNESS AND PREVENTION**

#	✓/ x	REGULATORY REQUIREMENTS	COMMENTS
1.		262.34(d)(4)-265.37 [SQG] or 262.34(a)(4)-265.37 [LQG, I.S.]	Cosand w folp & hospital
2.	/	Emergency coordinator on premiss or on call-262.34(d)(5) [SQG] or 262.34(a)(4)-265.55 [LQG, I.S.]	-c.s. saryes
3.	NA	Emergency coordinator's name and phone number, fire departments phone number, and the location of fire extinguishers and spill control equipment posted near phone [SQG only]-262.34(d)	

<sup>✓-</sup>in compliance X-not in compliance N/A-not applicable

D. PERSONNEL TRAINING (SQG - 262.34(d)(5)(iii), N/A, LQG's-262.34(a)(4) referencing 265.16, I.S.-265.16 only)

#	✓/ x	REGULATORY REQUIREMENTS*	COMMENTS
1.		Program director trained in hazardous waste management procedures (LQG only)-265.16(a)(2)	
2.		Employees do not work unsupervised without completing training & are trained within 6 mo. of initial hiring (LQG only)-265.16(b)	
3.		Employees are trained annually (LQG only)-265.16(c)	
4.	V	Job title & name of person filling position specified (LQG only)-265.16(d)(1)	
5.	8	Written job description including: skills, education or qualification, and duties (LQG only)-262.16(d)(2)	none
6.	8	Written description of type and amount of introductory & continuing training provided (LQG only)- 265.16(d)(3)	no written description of horz waiste training
7.		Training covers: response to emergencies, implementation of contingency plan, use of alarms, waste feed cut-offs & other emergency equipment, as required (LQG only)-265.16(a)(3)	
8.	,	Documentation confirming training has been completed (LQG only)-265.16(d)(4)	
9.		Records maintained on-site for current employees & for 3 years for former employees – 265.16(d) & (e) respectively	
10.		All employees are familiar with waste handling and emergency procedures relevant to their responsibilities (SQG only)-262.34(d)(5)(iii)	

	X-not in compliance					
11. Notes/Obser	vations: have been	weekly &	sectory	weeting s	on Friday	in mocess
	& training form					
	) 3	V		8		

## C. CONTINGENCY PLAN

(SQG - N/A, LQG's-262.34(d)(4) referencing 265 Subpart D, I.S.-265 only)

<i>#</i>	#	<b>√</b> / x	REGULATORY REQUIREMENTS*	COMMENTS				
1.		/	Has contingency plan-265.51(a)					
2.		d	Contingency plan maintained on-site-265.53(a)	Λ . <b>.</b>				
3.			Plan submitted to emergency response agencies-265.53(a)	- U.S. said it has been				
4.		1	Description of actions needed to respond to fires, explosions, or releases of hazardous waste-265.52(a)					
5.			Description of arrangements with local emergency agencies, as appropriate-265.52(c)	no allresses				
6.			List names, addresses & phone numbers (both home and office) of emergency coordinators & designate primary EC-265.52(c)					
7.			List & describe emergency equipment, its location and its capabilities, as required-265.52(e)	sublocations identified				
8.			Include complete evacuation plan (signal, alternate route), if required-265.52(f)	,				
9.			Emergency coordinator must be thoroughly familiar will all aspects of facility-265.55	C.S. sur I theyare				

<sup>/-</sup>in compliance X-not in compliance N/A-not applicable \*-please note applicable permit requirements

# Appendix 1-9

#### VISUAL REVIEW WORKSHEET AND CHECKLIST

# A. CONTAINER STORAGE AREA (Complete one form per storage area)

					The second second
1 Time of stores as seen	T - 00 1	7 - 100 Jan	7 - 270 Jan	DIC	Thamais
1. Type of storage area:	$\square \leq 90 \text{ day}$	LI S I BU day	$\Box < 2/0 \text{ day}$	□ 1.5.	L Permi

2. I.S /Permitted capacity:\_\_

#	√/x	REGULATORY REQUIREMENTS*	COMMENTS
3.		Date of accumulation marked and visible-262.34(a)(2)	
4.	V	Containers marked as "Hazardous Waste"- 262.34(a)(3)	
5.		Containers in good condition-262.34-265.171	
6.	1	Containers are compatible with waste-262.34-265.172	
7.	1	Containers kept closed-262.34-265.173(a)	
8.		Containers not opened, handled, & stored in a manner to cause them to leak-262.34-265.173(b)	
9.		Containers storing incompatible separated or protected from each other-262.34-265.177	
10.	J	Containers of ignitable/reactive waste stored >50 feet from property line [LQG's, I.S. & Permit, only]-262.34-265.176	behinlagainet was
11.	X	Adequate aisle space for type of container management and emergency equipment used-265.35	not adequate. hetween rows of behindage into wa to hourow for spill equip or adequate insp-
12.	1	Containers stored for less than 90/180/270 days, as applicable-262.34	
13.		Storage area inspected weekly-265.174	Cambris
		ADDITIONAL I.S. REQUIREMENTS*	
14.		Security: controlled entry, 24-hr. surveillance, or barrier-265.14(b)	
15.		"Danger Unauthorized Personnel Keep Out," signs posted-265.14(c)	
16.		"No Smoking" signs conspicuously posted-265.17(a)	
17.	*	Containers/Tanks clearly marked identifying their contents & with storage start date-268.50(a)(2)	
18.		LDR wastes not stored over 1 yr. without adequate justification-268.50(c)	
19.		Daily inspections loading.unloading areas (when in use)-265.15(a)(4)	
		PRE-TRANSPORT REQUIREMENTS*	
20.		Waste packaged, labeled, marked, per DOT-262.30, 262.31, 262.32, respectively	
21.		Placards available for use by transporters when applicable-262.33	

	#	✓/ x	REGULATORY REQUIREMENTS*	COMMENTS
	22.	X	Device available capable of summoning emergency assistance-265.34	east corner of 3torage and Cos said fire alarm at but door a 12' From east corner of 3torage and Cos - said fire alarm would not be used for over
2	23.		Adequate supply and proper spill control, decontamination and safety equipment (fire blankets, respirators, absorbent, etc.)-265.32	notification unless there was a fire.
	24.	V	Adequate water supply for fire control equipment-265.32(d)	Netr storage area & a few other locations
	25.		Communication and emergency equipment tested and maintained-265.33	
	26.		Facility operated and maintained to minimize possibility of emergency-265.31	eppeurs so
	√-in con	npliance	X-not in compliance N/A-not applicable *- please note app	licable permit requirement
	27. Conta	ainer inv	ventory:   Actual count   Approximate count	
	W	aste Ty	pe Container Size Total	
	vor /a	udra	1 x 55 gal x 30 gal	_ lelo gd. 9/1/07 all marked DOOZ
			x 55 galx 30 gal	
			x 55 gal x 30 gal	
			x 55 galx 30 gal	· · · · · · · · · · · · · · · · · · ·
			x 55 gal x 30 gal	
			x 55 galx 30 gal	
		,	x 55 gal x 30 gal	
			Total Quantity (pounds, gallons, etc.):	leleD callons
	28. How	were co	ontainer volumes verified? <u>Lappelon sules</u>	
			to verify observations: TYES NO Numbers: 1-2	
	30. Cont	ainer ma	anagement area location noted on map or diagram: ☐ YES ☐ Ŋ	(0
	31. Note	s Obser	vations: (1 VE a) Gran ~ Many (U)	I from neaves I corner at storage
_	over	N D	at door hoputside storagea	rea is 724 x 33 door
_	1.7	-50	gr. (12) (55 gel) = (660 gel	N
-			· · · · · · · · · · · · · · · · · · ·	
_			<del>,</del>	

# L. RCRA AIR EMISSIONS - SUBPARTS AA, BB and CC

1. Is this facility a LQG Interim Status TSD or Permitted TSD	If NOT, do not continue with the RCRA Air Emissions checklists
2. Location of records:	
3. Person responsible for records:	*

Assessing RCRA Air Emmission Requirements (Subparts AA, BB and CC) commonly applicable:

#	✓/ x	REGULATORY REQUIREMENT	MANIFEST #'s AND COMMENTS
1.		Subpart AA - 264/5.1030  Does the facility have any hazardous waste management unit using the following processes: distillation, fractionation, thin-film evaporation, solvent extraction, air stripping and steam stripping?  If NO, then proceed to the Subpart BB checklist.  If YES, refer to specific Subpart AA questions in Appendix 2-3.	-mo
2.	1	SUBPART BB regulated equipment - 264/5.1050  Does the facility have any valves, flanges, or pumps that contain or contact hazardous wastes with > than 10 % organics?	NO
a.		Does the facility have any compressors, pressure relief devices, sampling connection systems, flanged pipe open-ended valve or line that contain or contact hazardous wastes with > than 10 % organics?	
b.		Is the facility claiming the < 300 hours exemption?	
3.		If any of the answers to questions to 2 (a), (b) or (c) above is Yes, does the facility have a list of each piece of equipment that is subject to Subpart BB. (facility should have a list in their operating record, ask for copy) - 264/5.1064(g).	
a.		If the answer to questions 2(a) or 2(b) is No, does the facility have information or documentation to support its determination (obtain a copy of this documentation for EPA).	
4.		Has this equipment been marked as required by the Subpart BB Regulations? - 264/5.1050(g)	
5.		Has the facility implemented a LDAR program? - 264/5. 1064	
6.		See Appendix 2-3 for more specific Subpart BB questions.	
7.		SUBPART CC - 264/5.1080 Are there any units at the facility subject to the CC Rule?	no spent solvent generated to date, this location, 25
a.		If the answer to 7(a) is No, what is the reason? Refer to 40 CFR 265.1080(b) (264.1080(b) exceptions or 265.1083(c) (264.1082(c)) exemptions, or the general exclusions in 265.1(g) (264.1(g)).	
b.		If the answer is Yes, refer to Appendix 2-3 for more specific Subpart CC questions.	·

A	g	D	en	d	ix	1	-1	0
	-			-			_	_

#### **EXIT BRIEFING**

Reviewed all data collected and documented all concerns or violate     Location of the violation, type and amount of waste involved, tire     Illegal units - unit location (diagram/picture), dimensions, conditional endings of the contraction of the contra	
<ul> <li>Identified/verified violations from previous inspection were corrected.</li> <li>Addressed all unresolved inspection related issues</li> <li>Summarized findings and observations for the facility representations.</li> </ul>	
NOV issued?   Yes □ No □ Violations clearly identi	tified and explained, including: circumstances, location, and applicable regulations
Explained the importance of a timely (14 day) and adequate respondent that findings and observations are based on your curred Explained that compliance officer will make the final compliance Explained that recommendations provided are for informational Provided facility with CBI form Prepared Document Receipt form	rent knowledge of RCRA and that the final findings may differ ace decisions and that all compliance questions should be directed toward them I purposes only and DO NOT require specific actions by the facility
3. Specific information requested from facility?	
4. Facility appears to have awareness of RCRA regulations  ☐ Yes  5. Facility has its own environmental staff?  ☐ Yes ☐ No  6. Facility has copy of applicable regulations?  ☐ Yes ☐ No  7. Attitude and demeanor of facility representative(s): ☐ OK ☐ Not	
8. Notes/Observations:	
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*	

### **PHOTO LOG**

Facility Name / City: Tri Rinse, Incorporated

St. Louis, Missouri

**Facility ID #:** MOR000505958

Date: November 7, 2007

Photographer: David N. Whiting

Type of Camera: Canon Power Shot G5, Serial #: 6924106034

Digital Recording Media: Flashcard

All digital photos were copied by: David N. Whiting on 11/23/07

All digital photos were copied to: CD-R

Original copy is stored in: CD-R. Digital photos were downloaded to CD-R by David N. Whiting. No

changes were made in the original image files prior to storage on the CD-R.

Report Photo #	Photographer	Date	Approx. Time	File Name (IMG_xxx.jpg)	Description
1	David N. Whiting	11/07/07	2:30 pm	0482.jpg	Container storage area. Drums of hazardous waste in storage. Aisle space is inadequate.
2	David N. Whiting	11/07/07	2:30 pm	0483.jpg	Same drums seen in Photo #1.



Photo 2 Same drums seen in Photo 1.